

IN THE UNITED STATES DISTRICT COURT OF THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: DIGITEK

PRODUCTS LIABILITY LITIGATION

MDL NO. 1968

DECLARATION OF DAVID M. PETERSON IN SUPPORT OF THE JOINT MOTION FOR
COMMON BENEFIT FEES AND EXPENSES FILED BY THE PLAINTIFFS' STEERING
COMMITTEE

David M. Peterson declares that:

1. I am the founder and managing member of Peterson & Associates, P.C., a law firm with its office in Kansas City, Missouri.
2. I submit my declaration in support of the Joint Motion filed by the Plaintiffs' Steering Committee.
3. My firm is counsel to plaintiffs and claimants with cases pending in MDL 1968.
4. Throughout my 27 year career, I have been personally involved in complex litigation, including multi-plaintiff, class action and multi-district litigation involving claims for person injuries and property damages arising from alleged defective products, toxic and hazardous chemicals and materials, environmental contamination, to name a few.
5. On November 5, 2008, this Court signed Pretrial Order Number 5 appointing the Plaintiffs' Steering Committee, which included my appointment.
6. On December 17, 2008, I mailed a check for \$25,000.00 to Co-Lead Counsel Harry Bell representing my assessment. These funds were used to benefit all of the Digitek Plaintiffs and Claimants for costs to be incurred in this litigation.
7. I am not requesting any Common Benefit Attorneys Fees or additional expenses. I am only requesting reimbursement of the \$25,000.00 assessment paid by me in the early stages of the litigation for costs and expenses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 1/7/11

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**IN THE UNITED STATES DISTRICT COURT
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CHARLESTON DIVISION

IN RE: DIGITEK® PRODUCTS LIABILITY
LITIGATION

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THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF JAMES J. PETTIT

I, James J. Pettit, Esquire, hereby certify as follows:

1. I am an attorney at law in the State of New Jersey and a partner in the Locks Law Firm LLC. I represent plaintiffs in the Digitek litigation in the MDL and in state court in New Jersey. As such, I am familiar with the facts and circumstances of this matter.
2. I was appointed to the Plaintiff's Steering Committee ("PSC") of the MDL by Court Order.
3. I have remained an active member of the PSC since that date. While the PSC was relatively large compared to some other MDL's in which I have been involved, the actual number of firms (and attorneys in those firms) which actively litigated this matter was small. That is, in my personal observation, about six or so attorneys performed 95% of the non-class action MDL work and I was one of those six.
4. I personally spent about 726.65 hours on this matter which were ultimately

beneficial to all cases as set forth below. I previously provided my time sheets to Lead Counsel. None of those hours were for work limited specifically to my personal injury cases, although a few hours involved attending New Jersey state court Case Management Conferences, about which I reported to lead counsel so that federal-state coordination could occur more readily. Some of these hours (about 145.96 hours) were spent on MDL class action work but the rest was for MDL generic liability work and MDL generic expert work.

5. The vast majority of my efforts, therefore, was focused on (a) developing the liability issues in these cases, and (b) to some extent, the generic expert issues in these cases. I respectfully contend that this work inured to the common benefit of every case, because to the extent that defendants believed any settlement was warranted, it was certainly in large measure because every plaintiff in the country could utilize the PSC work product on liability and generic experts; secondly, the willingness of defendants to offer a settlement was, I contend, based in large measure on the work that the handful of lawyers performed.

6. I personally read thousands of documents produced by defendants. I personally read over thirty (30) deposition transcripts of defense corporate personnel and related exhibits thereto. I did contribute to the internal issue coding system established by the PSC in this regard, but to a greater extent I relied on my own knowledge of these voluminous documents (a) when I personally examined defense personnel in depositions and (b) to assist in analyzing deposition transcripts where others took the lead and I suggested strategies. I personally reviewed voluminous defense pleadings, discovery and motions.

7. I personally prepared for and deposed five (5) defense personnel. I also contributed ideas and strategic suggestions to other plaintiff counsel for their depositions.

8. The following lists the depositions where I examined the witness. I contend that

these were some of the more important depositions and contributed important testimony and discussion of exhibits to the case plaintiffs were developing.

Richard Dowling
Phyllis Lambridis
Daniel Bitler
Ashesh Dave
Jasmine Shah

9. My reading of deposition transcripts and the exhibits thereto was not duplicative work, but rather was to develop cross-references for upcoming depositions by other counsel, and secondly to suggest ideas for use by generic experts and for use in upcoming depositions.

10. I traveled to and attended PSC meetings, in Houston, Philadelphia, New York and Charleston, South Carolina. At those meetings, I discussed strategy, reported on New Jersey state court litigation, analyze the results of depositions and discussed the status of experts.

11. I personally attended the June 2010 plant inspections of the buildings involved in this matter in northern New Jersey. I took notes, spoke to our expert, discussed the physical equipment and layout with our expert and fellow counsel and contributed suggestions for expert strategy. I suggested possible uses of our hands-on knowledge of the equipment and physical space could be used as probative evidence.

12. I sent and reviewed about one thousand (1,000) e-mails, primarily involving lead counsel and liability discovery and motions. This was not rote communication, but rather involved sophisticated strategy decisions. Frequently these e-mails were limited to the four, five or six lawyers performing the vast majority of the work.

13. Most of the conference calls in which I participated involved only three (3) or four (4) plaintiffs' counsel.

14. I cleared each and every assignment with Lead Counsel. Everything I did in the liability work and in the generic expert work was approved by Lead Counsel. This close communication with Lead Counsel prevented duplicative work and ensured all my work was part of the general strategy approved by lead counsel.

15. I participated in conference calls about generic experts and one with a generic expert. Indeed, much of the discussion with that one expert on that call was directly with me.

16. I routinely, regularly and frequently discussed general liability strategy with Lead Counsel and the five or so other lawyers who did most of the work. I discussed the identity of corporate personnel to depose, exhibits, lines of questioning, and the order of witnesses. I discussed how specific previous testimony could be utilized on the second session of some witnesses, and could be used against other witnesses. I discussed specific documents and phrases in documents to use with specific corporate personnel, and to discuss with specific experts.

17. My firm worked as efficiently as we could, by which I mean I did not have multiple lawyers and paralegals re-reading the same materials unless absolutely necessary for their assignments. As the partner managing this work I attempted to perform personally as much of the work as I could, to ensure that we were not merely running up billable hours.

18. As a result, I believe our hours achieving much more tangible results, with a minimum of (I think absence of any) wasted effort or duplicative effort. Whether working on FDA issues, creating a collection of "hot" documents, identifying "adverse" documents, developing a coherent body of evidence, cross-referencing precise factual testimony with specific paragraphs in large documents, creating useful chronologies, tracking inconsistencies, or developing a factual predicate for experts, Lock Law Firm worked diligently to produce

meaningful work product rather than extensive hours.

19. My associate, Pamela Lee, spent 186.80 hours under my direct supervision. Only 24.3 hours of this was on class action work. She adopted my philosophy of working efficiently rather than to amass hours. She worked on legal research, document review and summary, and assisted me in preparing for depositions of corporate personnel. My partner, Jonathan Miller, spent 9.25 hours on a very specific and important legal issue. My paralegal Michelle Biazzo, worked on locating documents, interacting with the PSC document repository, and handled many other logistics. Only 29.75 hours of her work was on class action issues.

20. Here is a summary of Locks Law Firm LLC hours.

Partner-James J. Pettit-total 726.65 hours

MDL- 580.75

CLASS- 145.9

Partner-Jonathan Miller-total 9.25 hours

MDL- 9.25

CLASS- 0

Associate-Pamela Lee-total 186.80 hours

MDL- 162.50

CLASS- 24.3

Paralegal-Michelle Biazzo-total 70.10 hours

MDL- 40.35

CLASS-29.75


20. James Pettit's hourly rate is \$550.00; Jonathan Miller's hourly rate is \$500.00; Pamela Lee's hourly rate is \$200.00; Michelle Biazzo's hourly rate is \$150.00.

21. Locks Law Firm LLC contributed \$25,000 upon my being appointed to the PSC, and we incurred an additional \$9,982.81 in travel expenses and some other items. This was

previously submitted to Lead Counsel. None of this has been reimbursed yet. None of this was related to my individual cases. A small amount involved record collection in the class actions.

I have previously been awarded attorney fees at an hourly rate in excess of \$500.00 per hour In Re Diet Drug Litigation by Judge Bechtel of the Eastern District of Pennsylvania for Common Benefit work.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



JAMES J. PETTIT
LOCKS LAW FIRM LLC
Attorneys for Plaintiff

Date: February 10, 2011

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

5/10/08	0.50	Review Palladino Memo (MAG)
5/12/08	0.25	Review SK Memo re: Palladino
5/13/08	1.50	Review FDA documents
5/13/08	2.75	Review medical literature
5/14/08	1.00	Review FDA documents
5/14/08	2.25	Review medical literature
5/16/08	1.50	Review Labeling information
5/16/08	2.75	Review FDA documents
5/20/08	1.75	Review medical issues with expert
5/24/08	1.00	Review Palladino records
5/24/08	1.75	Research Medical articles
5/27/08	6.75	Draft Complaint in Palladino
5/29/08	1.50	Continue draft Complaint in Palladino

Total Hours: 25.25

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

6/02/08	0.10	Memo to GL re class
6/02/08	0.75	Review medical literature
6/04/08	1.00	Legal Research – recent NJ Class Action law on EFA/Economic Loss
6/04/08	2.75	Legal Research on emergency nature of class
6/04/08	0.50	Phone conference GL, JJP, MAG, SK
6/04/08	0.25	Phone con MW
6/04/08	2.50	Revise draft Complaint in Palladino re: recent case law
6/04/08	3.25	Review MW documents
6/05/08	1.25	Review MW pleading
6/05/08	0.10	Memo to MAG/SK
6/06/08	2.50	Draft Palladino Class Action Complaint
6/06/08	0.10	Review MAG/SK memos
6/06/08	1.75	Finalize draft Complaint
6/06/08	0.25	Memo to GL, MPW, SK

Total Hours: 17.05

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

7/03/08	1.00	Conference Call – Plaintiff Counsel
7/03/08	0.25	Draft Memo re: call
7/16/08	0.75	Research – medical issues
7/16/08	0.75	Research into experts

Total Hours: 2.75

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

8/06/08	0.50	Research re: Actavis, et al.
8/07/08	0.50	Research re: Stericycle
8/13/08	5.75	Begin draft motion for Preservation re: Palladino
8/14/08	1.00	Review Removal Paperwork (Palladino)
8/14/08	1.25	Begin review of Removal
8/14/08	0.25	Review Answer in Palladino
8/15/08	1.00	Continue review of Removal
8/15/08	0.50	Draft memo on initial Removal research
8/15/08	3.50	Research Remand of Palladino
8/19/08	1.25	Reviewed PTO #1

Total Hours 15.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

9/02/08	1.25	Conference call P attorneys
9/08/08	1.25	Review Draft discovery to defendants
9/10/08	1.00	Review Palladino records
9/19/08	0.25	Review DNJ order re: Palladino
9/26/08	0.50	Reviewed PTO #2

Total Hours 4.25

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

10/02/08	0.50	Review Palladino memo and file
10/06/08	0.25	Review DNJ Order re: Palladino
10/08/08	0.25	Reviewed PTO #3
10/13/08	0.75	Review materials re: Digitek tablet inspections
10/16/08	0.25	Memo to PAL and KA re: Palladino
10/16/08	0.75	Review Protocol et al from Barry Hill
10/17/08	0.50	Review files and literature to prepare for conf call
10/17/08	1.00	P lawyers conf call
10/17/08	0.25	Phonecon Mike Weinkowitz re class
10/17/08	0.25	Memo to Mike Weinkowitz re class
10/17/08	0.25	Memo to Gene Locks re class
10/20/08	0.75	Review additional documents re: tablet testing

Total Hours 5.75

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

11/05/08	1.25	Reviewed PTO #4
11/07/08	0.25	Memo to KA re: Palladino
11/07/08	0.50	Review FDA Documents
11/13/08	0.25	Reviewed PTO #5
11/19/08	1.25	Review FDA Documents
11/24/08	0.10	Reviewed PTO #6

Total Hours 3.60

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

12/02/08	0.50	Reviewed PTO #7
12/09/08	0.25	Reviewed PTO #8
12/10/08	1.25	Research re: ADEs
12/23/08	0.25	Memo to KA re: Palladino
12/29/08	0.25	Memo to SK re: Palladino
12/29/08	0.25	Review SK memo re: Palladino
12/30/08	0.50	Reviewed PTO #9

Total Hours 3.25

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

1/14/09	1.75	Research medical literature
1/27/09	0.25	E-Mail Plaintiff counsel re: discovery to defendants
1/28/09	1.50	Review next draft of discovery to defendants
1/29/09	0.50	Reviewed PTO #10
1/30/09	0.25	Prep for call
1/30/09	1.00	Conference call- Plaintiff counsel
1/30/09	0.25	Memo re call

Total Hours 5.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

2/3/09	3.00	Travel to/from NYC (meet with Ds)
2/3/09	2.00	Meet with defense counsel
2/04/09	0.50	Reviewed PTO #11
2/05/09	1.75	Reviewed PTO #12
2/06/09	0.25	JJP memo to JM re: burden shifting
2/06/09	0.50	Review PCS Memo
2/11/09	0.50	Legal Research re: defendants' burden shifting
2/11/09	0.25	Review e-mail from JM re: research on burden
2/11/09	1.00	Reviewed PTO #13
2/12/09	1.50	Draft PSC Application
2/13/09	0.50	Review Ric Fern materials
2/13/09	0.75	Review Mylan (Palladino)
2/17/09	0.25	Reviewed PTO #14
2/19/09	0.50	Review JM memo re: burden shifting
2/23/09	1.25	Review JM research on burden shifting

Total hours: 14.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

3/04/09	0.25	Reviewed PTO #15
3/05/09	2.00	Reviewed PTO #16
3/06/09	0.25	Draft e-mail to MJC
3/06/09	1.50	Review fact sheet format for Palladino
3/09/09	1.25	Review Fact Sheet re: Palladino
3/09/09	0.25	Draft memo to PAL re: Palladino
3/09/09	0.25	Reviewed PTO #17
3/16/09	0.50	Review PSC memo
3/17/09	2.00	Meet defense counsel re liability issues
3/17/09	1.00	Travel to and from meeting
3/17/09	1.00	Memo re meeting
3/20/09	0.50	Reviewed PTO #18
3/23/09	1.00	Phonecon Plaintiffs regarding liability issues
3/23/09	0.50	Review Actavis discovery response
3/23/09	0.50	Review Mylan discovery response
3/24/09	0.50	Review S. Stadtmauer documents
3/24/09	0.50	Review Defendants' RFP responses
3/25/09	0.25	Reviewed PTO # 19
3/26/09	1.00	Prepare for CMC
3/26/09	2.00	Travel to CMC
3/27/09	3.50	CMC
3/27/09	2.00	Travel from CMC

Total Hours 22.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

4/07/09	0.25	Phonecon MW
4/07/09	0.25	Prep for conf call
4/07/09	0.50	Conf call D and P attorneys
4/07/09	0.25	Memo re conf call
4/07/09	0.25	E-mail P attorneys re conf call
4/08/09	2.25	Review defendants' responses to interrogatories
4/08/09	0.75	Review all versions of Preservation Order
4/08/09	0.50	Conf call Ds and Ps re Preservation Order
4/08/09	0.25	Memo re conf call
4/08/09	0.25	E-mail Ps re conf call
4/13/09	1.00	Reviewed PTO #20

Total Hours 6.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

5/04/09	0.25	Reviewed PTO #21
5/19/09	1.50	Reviewed PTO #22
5/28/09	2.00	Review deposition transcript
5/28/09	0.50	Draft deposition summary
5/29/09	1.00	Review FDA documents
5/29/09	0.50	Review MJC memo
5/29/09	0.25	Reviewed PTO #23

Total Hours 6.00

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

6/01/09	0.25	Review MJC memo
6/01/09	1.75	Review defense documents (corporate)
6/04/09	0.50	Review PSC letter
6/04/09	1.50	Review defense discovery responses
6/05/09	2.25	Review deposition transcript
6/05/09	0.50	Draft deposition summary
6/05/09	1.00	Conference call MDL
6/08/09	0.25	Review Dep Notice (Palladino)
6/09/09	0.35	Meet PAL re class discovery
6/09/09	0.35	Phonecon MW re class discovery
6/09/09	0.50	Research equipment re Digitek
6/09/09	0.25	Meet PAL re Palladino discovery
6/09/09	0.10	Phonecon SK re Palladino discovery
6/09/09	0.10	Memo to SK re Palladino discovery
6/09/09	0.25	Memo to PSC re Palladino discovery
6/09/09	1.50	Review defendant's documents
6/10/09	0.50	Prep for PSC meeting (Houston)
6/10/09	4.00	Travel to PSC meeting (Houston)
6/10/09	2.00	Dinner meeting with PSC
6/11/09	0.50	Review Digitek identification documents
6/11/09	0.25	Review PAL memo re: Palladino
6/11/09	5.00	PSC meeting (Houston)
6/11/09	4.00	Travel from PSC meeting (Houston)
6/11/09	0.50	Review Palladino file
6/12/09	2.00	Begin review 5/22 defense responses (MDL)
6/14/09	0.50	Draft memo to PAL re: Palladino
6/14/09	0.75	Review defense motion
6/15/09	1.00	Review discovery in prep for class action conf call
6/15/09	0.75	Class Action Committee conf call
6/15/09	2.25	Continue review 5/22 defense responses (MDL)
6/15/09	0.25	Meeting PAL re class action discovery
6/15/09	0.75	Draft memo re class rep deposition to Class Action Committee
6/16/06	1.00	Conference call class action committee
6/16/09	1.50	Court status conference (phone)
6/16/09	0.50	Memo to PAL re status conference
6/16/09	1.75	Review documents (corporate)
6/17/09	0.25	Reviewed PTO #24
6/17/09	2.50	Review documents (corporate)
6/17/09	1.25	Begin draft class action discovery
6/17/09	0.25	Phonecon MW, JG re discovery
6/17/09	0.50	Phonecon Fred Thompson et al
6/17/09	0.25	E-mail defense counsel re discovery

6/19/09	2.00	Review JM Memo re: NJ Class in MDL
6/19/09	1.00	Review Actavis Brief
6/22/09	1.75	Review plaintiffs' (MDL) Motion to Quash, Expand Scope of Discovery
6/23/09	0.25	Review Moriarty letter re Palladino
6/23/09	0.50	Review defense letter
6/23/09	1.25	Review defense discovery responses
6/23/09	2.25	Review Actavis Opposition (MDL) to Expand Scope of Discovery
6/24/09	0.50	Meet PAL re: Palladino
6/24/09	0.25	Memo to Class Action Committee
6/24/09	0.10	E-mail to MJC re MDL discovery
6/24/09	0.50	Meeting PAL/MB re discovery
6/24/09	1.75	Review defendants' documents
6/24/09	0.25	Memo to Class Action Committee
6/25/09	0.25	Review defense letter
6/25/09	2.25	Review defendants' documents
6/25/09	0.10	Draft e-mail to defense counsel
6/29/09	0.50	Draft memo to PAL/MB/TK re: Palladino
6/29/09	0.50	Review PAL draft motion to compel (pursuant to MDL PSC)
6/29/09	1.75	Review Palladino file for deposition
6/29/09	0.50	Memo to PAL, MB and TK regarding preparation for deposition
6/29/09	2.00	Draft JJP portion of motion
6/29/09	0.25	Review PAL memo re motion to compel
6/29/09	0.10	Draft memo to PAL re motion to compel
6/30/09	0.50	Meet PAL re Actavis phonecon re motion to compel
6/30/09	0.25	Review PAL e-mails to Actavis and Seeger re discovery
6/30/09	0.25	Draft e-mail to MDL PSC re motion to compel
6/30/09	0.50	Conference call-document review committee training
6/30/09	0.50	Meet PAL/MB re MDL document review
6/30/09	2.75	Review documents (corporate)
6/30/09	0.25	Review several PSC e-mails
6/30/09	1.75	Review PSC Class Action Committee pleadings, charts and deposition list

Total Hours 73.45

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

7/01/09	1.50	Conference call with Ps re class actions
7/01/09	0.50	Memo re conf call for us in Palladino
7/01/09	0.10	E-mail to lead counsel
7/01/09	0.50	Review PTO #27
7/01/09	0.50	Review PTO #28
7/02/09	0.25	Meet PAL/MB re Palladino deposition
7/02/09	3.00	Review documents (corporate)
7/02/09	2.50	Review deposition transcript
7/06/09	2.00	Draft Amended Complaint in Palladino
7/06/09	0.25	Memo to MDL Class Action Committee
7/06/09	0.10	Memo to PAL re defense affidavit
7/06/09	0.25	Review PTO #29
7/06/09	0.10	Review Bell memo re class
7/06/09	3.50	Draft class action Rgs and RFP
7/06/09	0.25	Meet PAL re class action discovery
7/06/09	0.50	Review draft amended complaint in Palladino
7/06/09	0.25	Memo to PAL re AC in Palladino
7/07/09	0.50	Review MJC memo re: Class
7/08/09	0.50	Review defense Deposition Notice
7/09/09	0.10	E-Mail to defendants
7/09/09	0.10	E-Mail to lead counsel
7/09/09	0.50	Draft Consent Order in Palladino
7/09/09	0.25	Meet PAL/MB re Palladino dep prep
7/09/09	1.00	Review Palladino file for client prep
7/09/09	1.50	Prep client re deposition
7/09/09	0.25	Draft memo re Palladino client meeting
7/09/09	0.10	Draft e-mails to P and D counsel re Palladino
7/10/09	1.50	Review defense discovery responses
7/10/09	0.75	Conference call MDL PSC Class Action Committee
7/10/09	0.50	Meet PAL/MB re Palladino
7/10/09	2.75	Legal research re substitution of Palladino class rep
7/10/09	0.25	Draft memo re Palladino
7/10/09	0.25	Review Dean letter
7/10/09	0.25	Review PSC letter re protocol
7/10/09	0.25	Draft proposal for PSC letter
7/14/09	1.25	Review defense discovery responses
7/14/09	2.50	Legal research on ex parte interviews
7/14/09	0.50	Draft two memos to MDL lead counsel on ex parte interviews
7/14/09	2.00	Meeting with PSC
7/21/09	0.50	Review recent FDA statement
7/24/09	0.35	Review lead counsel letter re Palladino and case law
7/24/09	1.75	Legal research re economic loss class

7/24/09	2.00	Review documents (corporate)
7/28/09	1.00	Review FDA documents

Total Hours 39.20

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

8/03/09	1.00	Review PTO #33
8/03/09	0.25	Draft memo re PTO #33
8/04/09	4.00	Review documents (corporate)
8/10/09	0.25	Meeting PAL/ MB
8/10/09	1.25	Meeting class representative Alan Chambers
8/10/09	0.50	Draft memos re Chambers
8/10/09	0.25	Review PAL memo re Chambers
8/10/09	0.25	Review draft amended complaint re Chambers
8/10/09	0.75	Review PTO #37
8/11/09	0.75	Attend conference (by phone)
8/11/09	0.10	Memo to PSC lead counsel
8/11/09	0.25	Memo to PAL re conference
8/11/09	0.10	Review Chambers consent order
8/11/09	0.25	Meeting PAL re Chambers
8/11/09	0.10	Memo to PM re discovery
8/11/09	0.50	Review PM memo re discovery
8/11/09	0.50	Review Chambers complaint
8/11/09	0.25	Prepare for Defense phonecon
8/11/09	0.50	Phonecon with defense counsel re class action and motion to compel
8/11/09	0.50	Memo to PSC re Chambers
8/11/09	0.50	Memo to PSC re motion to compel
8/12/09	0.50	Draft memo to lead counsel
8/12/09	1.00	Conference call
8/13/09	0.25	Review Moriarty letter re Chambers class action
8/13/09	0.50	Draft memo to PSC re motion to compel
8/13/09	0.50	Draft memo to PSC re Chambers class action
8/13/09	0.25	Phonecon PM re motion to compel
8/13/09	0.10	Draft e-mail to defense counsel re motion to compel
8/13/09	0.10	Draft e-mail to defense counsel re Chambers class action
8/13/09	0.50	Several meetings with PAL/MB re Chambers class action
8/14/09	0.50	File Amended Complaint (Palladino)
8/14/09	0.50	Several meetings with PAL.MB re Chambers class action
8/14/09	1.50	Review Chambers PFS, Auths, medical records, pharm records
8/14/09	0.25	Serve Chambers materials
8/14/09	0.10	Review MJC e-mail re Chambers
8/14/09	0.10	Draft e-mail to MJC re Chambers
8/14/09	3.50	Review documents (corporate)
8/17/09	0.75	Review MJC Chart
8/20/09	2.25	Review PSC memo re discovery
8/20/09	3.50	Review documents (corporate)
8/25/09	0.25	Review DW Chart

8/26/09	0.10	Draft memo to lead counsel
8/31/09	1.75	Review defense responses

Total Hours 31.55

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

9/01/09	1.00	Review defense responses
9/03/09	1.00	Conference Call PSC
9/03/09	0.25	Memo to lead counsel
9/03/09	0.25	Additional memo to lead counsel
9/03/09	0.50	Meet PAL.MB re Chambers
9/03/09	0.10	e-mail to PSC lead counsel
9/03/09	0.25	e-mail to PSC lead counsel
9/03/09	0.50	Review Harry Bell chart
9/03/09	0.25	e-mail to PSC lead counsel
9/03/09	1.50	Review Actavis responses to class discovery
9/03/09	1.00	Summarize select documents
9/03/09	1.50	Review Mylan responses to class discovery
9/03/09	0.50	Memo re Mylan responses
9/03/09	0.50	Review UDL responses to class discovery
9/03/09	0.25	Memo re UDL responses
9/09/09	4.25	Review documents (corporate)
9/10/09	1.75	Review defense motion
9/14/09	0.75	Review defense motion
9/14/09	2.75	Review documents (corporate)
9/15/09	0.50	Review defense motion
9/15/09	0.25	Review MJC e-mail re class
9/15/09	4.00	Travel to/from NYC
9/15/09	2.00	CMC
9/16/09	1.50	Review documents (corporate)
9/16/09	1.25	Summarize select documents
9/16/09	1.00	Review Alan Chambers file
9/16/09	1.75	Review prior class re deposition
9/17/09	0.10	Review MJC memo re class discovery
9/17/09	0.25	Memo to class committee
9/17/09	2.25	Review Chambers file
9/17/09	2.25	Prep Alan Chambers for dep
9/17/09	0.50	Memo re prep of Chambers
9/17/09	0.50	Research re: experts
9/17/09	0.25	E-Mail to lead counsel
9/18/09	0.75	Review document review procedures
9/18/09	1.25	Draft memo re Actavis responses to class discovery for motion
9/18/09	1.50	Draft memo re Actavis responses to class discovery for motion
9/18/09	2.00	Review documents (corporate)
9/18/09	0.75	Review defense brief
9/21/09	3.25	Review documents (corporate)
9/21/09	0.50	Reviwe MJC memo

9/22/09	0.50	Review Chambers file for dep
9/22/09	0.75	Prep Chambers for dep
9/22/09	3.00	Deposition of Alan Chambers
9/22/09	0.50	Meet with Alan Chambers
9/22/09	0.75	Draft memo re Chambers dep
9/22/09	0.50	Phonecon MJC
9/22/09	0.50	Review Document Memo
9/22/09	0.25	Review MJC Memo
9/22/09	0.25	E-Mail to lead counsel
9/23/09	0.25	Phonecon Lead Counsel
9/23/09	0.75	Draft memo to PSC
9/23/09	0.25	Phonecon FT and MJC
9/23/09	0.50	Draft memo to Class Action Committee
9/23/09	0.50	Review various letters to defendants re discovery
9/23/09	0.10	Phonecon MJC
9/23/09	1.75	Review documents (corporate)
9/23/09	0.25	Review drafts of letters to defense
9/24/09	0.50	Review draft discovery motion
9/24/09	0.10	Draft e-mail to MJC
9/24/09	2.00	Review documents (corporate)
9/24/09	0.75	Review draft brief
9/24/09	0.25	Memo to lead counsel
9/28/09	0.50	Review defendants' discovery response in KELCH
9/28/09	0.75	Review Mylan letter
9/28/09	0.50	Review Actavis letter
9/28/09	1.00	Draft memo to class committee re Mylan
9/28/09	0.50	Draft memo to class committee re Actavis
9/28/09	1.50	Review motion to compel
9/28/09	0.25	Review motion to compel
9/28/09	0.50	Memo to Class Committee
9/28/09	0.25	Review letter to Court
9/29/09	4.50	Review documents/coding
9/30/09	0.25	Memo re: document review

Total Hours 72.65

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

10/01/09	0.25	Review numerous lead counsel e-mails
10/01/09	0.25	Prepare for conference call
10/01/09	1.00	Conference call with lead counsel
10/01/09	0.25	Draft memo re conf call
10/01/09	1.00	Document review- coding
10/01/09	0.50	Review MJC Chart
10/01/09	0.25	Memo to Lead Counsel
10/02/09	0.25	Prepare for conf call
10/02/09	1.00	Conference call re class actions
10/02/09	0.25	Memo re conf call
10/05/09	0.75	Review defense brief
10/06/09	1.75	Review MDL deposition documents
10/06/09	3.00	Review documents (corporate)
10/08/09	0.50	Review defense brief
10/14/09	0.50	Review D brief opposing extension
10/14/09	1.00	Review defense brief
10/14/09	0.50	Review defense joint brief
10/14/09	0.50	Review Mylan brief
10/16/09	0.50	Draft memo to lead counsel re corporate documents
10/16/09	0.10	Review MJC e-mail
10/19/09	3.00	Travel to/from PSC meeting
10/19/09	1.50	Meet with lead counsel/other P counsel
10/19/09	2.50	PSC meeting (NYC)
10/19/09	1.00	Meet MJC and others re Reply Brief
10/19/10	0.50	Draft memo re PSC meeting
10/20/09	0.50	Draft action memo and notes from PSC meeting
10/20/09	0.25	Review refund documents
10/20/09	3.50	Review documents (corporate)

Total Hours 26.85

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

11/02/09	0.50	Memo to lead counsel
11/03/09	0.50	Memo to lead counsel
11/03/09	1.00	Review documents re Mylan
11/03/09	0.25	Memo to lead counsel re discovery
11/03/09	0.10	Review email from EB
11/03/09	0.10	Meet with MB re documents
11/03/09	0.25	E-mail to PSC re documents
11/03/09	0.25	Review multiple lead counsel e-mails
11/03/09	0.25	Draft multiple e-mails to lead counsel
11/03/09	2.50	Review documents (corporate)
11/03/09	0.50	Memo to lead counsel
11/04/09	0.75	Conf call re class action
11/04/09	0.50	Memo re class action call
11/04/09	1.25	Review documents (corporate)
11/05/09	0.25	Review MJC letter
11/05/09	4.50	Draft analysis for Class Cert Brief
11/06/09	2.25	Draft analysis for Class Cert Brief
11/06/09	0.25	Send memo to class cert committee
11/13/09	2.75	Review documents (corporate)
11/13/09	0.50	Prepare for Class Action Committee call
11/13/09	0.50	Conf call re class action
11/16/09	0.25	Review MJC memo
11/16/09	3.50	Review documents (corporate)
11/16/09	0.50	Meet PAL re Chambers class certification
11/17/09	0.50	Review PAL research on class cert
11/17/09	0.25	Meet PAL re Class Cert Brief
11/17/09	1.25	Legal research- Class Cert Brief
11/17/09	0.50	Memo to Class Action Committee
11/17/09	3.75	Legal research Class Cert Brief
11/18/09	1.25	Conference call on Class Cert
11/18/09	0.25	Memo on conference call
11/18/09	2.25	Begin draft appeal of PTO #46
11/18/09	2.50	Legal research Class Cert Brief
11/19/09	3.75	Review documents (corporate)
11/20/09	2.00	Attend Case Management conference (by telephone)
11/23/09	3.00	Review Adjei deposition
11/23/09	1.75	Review deposition exhibits
11/23/09	1.00	Conference call
11/24/09	2.75	Review Mayo deposition
11/24/09	0.50	Review deposition exhibits
11/25/09	3.25	Review Eamonn Murphy dep
11/25/09	1.50	Review Murphy exhibits
11/28/09	0.25	Memo to PSC

11/30/09	2.25	Review Anil Patel dep
11/30/09	0.50	Review exhibits

Total Hours 58.95

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

12/2/09	2.00	Review N. Patel Dep
12/2/09	0.75	Review deposition exhibits
12/2/09	4.00	Travel to/from CMC
12/2/09	2.00	CMC
12/3/09	2.25	Review Lourdes dep
12/3/09	0.25	Review exhibits
12/8/09	1.75	Review B. Shah dep
12/8/09	0.50	Review exhibits
12/9/09	2.75	Review Toole dep
12/9/09	0.25	Review exhibits
12/10/09	0.10	Draft e-mail to MJC re Dowling
12/10/09	3.50	Review Dowling documents
12/10/09	0.10	Review MJC e-mail
12/10/09	0.25	Draft e-mail to lead counsel
12/10/09	0.25	Memo re: Actavis document productions
12/11/09	0.50	Review letters re depositions
12/11/09	4.25	Review Roychowdhury dep
12/11/09	0.25	Review FT memo
12/14/09	5.75	Prepare for Dowling dep
12/16/09	3.00	Travel to/from Dowling dep
12/16/09	7.00	Dowling deposition
12/17/09	1.00	Dowling deposition summary
12/18/09	0.25	Memo to lead counsel
12/22/09	0.75	Review A. Kinkhabwala deposition
12/22/09	4.00	Review da one P. Galea deposition
12/24/09	3.75	Review T. Nataline deposition
12/28/09	0.25	Review e-mail re depositions
12/28/09	0.50	Review deadline chart
12/28/09	0.25	Review MJC memo
12/28/09	0.25	Draft e-mail re depositions
12/28/09	4.75	Review S. Roychowdhury deposition
12/28/09	1.75	Review R. Dowling deposition
12/29/09	1.25	Review defense documents (corporate)

Total Hours 60.20

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

1/2/10	0.10	Draft e-mail to Class Committee
1/4/10	2.75	Review documents (corporate)
1/4/10	0.25	Draft e-mail to lead counsel re depositions
1/4/10	0.10	Review MJC e-mail re depositions
1/4/10	0.25	Review MJC e-mail re discovery
1/4/10	0.50	Draft memo to P counsel re discovery
1/4/10	0.50	Memo to lead counsel
1/7/10	0.25	Meeting MB re dep exhibits
1/7/10	0.25	Review Agenda and Calendar
1/7/10	0.25	Phonecon Pat Avery re class
1/7/10	1.25	Conference call PSC
1/7/10	0.25	Memo re conf call
1/7/10	3.00	Review Bitler documents
1/8/10	0.50	Review letter forwarded by MJC
1/8/10	0.50	Review several P e-mails
1/8/10	0.25	Draft e-mail re documents
1/8/10	0.25	Review e-mail from Sofia B
1/8/10	0.10	Draft e-mail to SB
1/8/10	1.25	Review Bitler documents
1/08/10	0.50	Memo re: document review
1/08/10	0.25	Memo re: documents
1/9/10	2.25	Review Bitler documents
1/10/10	3.00	Review Bitler documents
1/11/10	1.25	Review Chambers file re class brief
1/11/10	1.00	Draft section of class brief
1/11/10	0.75	Review Lead Counsel Memo
1/16/10	4.25	Review Lambridis documents
1/17/10	6.50	Review Lambridis documents
1/17/10	2.00	Travel to Wayne, NJ
1/18/10	1.00	Prepare for Lambridis deposition; meet with P lawyers
1/18/10	7.00	Attend/depose Lambridis
1/18/10	2.50	Travel from Wayne, NJ
1/19/10	3.75	Review class certification brief
1/19/10	0.75	Legal research on issues in brief
1/20/10	0.25	E-mail entire PSC
1/20/10	0.75	Conference call class action committee
1/20/10	0.25	E-mail to class committee
1/20/10	2.00	Review class certification brief
1/ /10	2.75	Review draft Motion for class certification
1/21/10	0.75	Review Motion for class certification
1/26/10	1.00	Conference call deposition team
1/26/10	0.25	Draft memo re call

Total Hours 57.30

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

2/01/10	0.25	Draft letter to Judge Goodwin
2/06/10	0.50	Draft Memo re: Inspection
2/15/10	2.50	Review S. Wolfe deposition
2/15/10	1.75	Review P. Lambridis deposition
2/15/10	1.00	Review documents (corporate)
2/17/10	2.25	Review D. Bitler deposition
2/17/10	2.50	Review M. Adams deposition
2/18/10	1.75	Review S. Bird deposition
2/18/10	0.75	Review documents (corporate)
2/19/10	3.25	Review defendants' Opposition paper (class certification)
2/19/10	4.00	Review S. Talbot deposition
2/20/10	1.25	Legal research
2/22/10	2.25	Review L. Radoke deposition
2/22/10	3.00	Review J. Zhu deposition
2/23/10	2.75	Review W. Eng deposition
2/23/10	2.25	Review documents (corporate)
2/26/10	1.00	Review draft Reply

Total Hours 33.00

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

3/2/10	2.25	Review N. Hakim deposition
3/2/10	1.75	Review exhibits for brief
3/2/10	0.25	Memo to Class Committee
3/2/10	0.50	Review numerous class committee e-mails
3/3/10	1.25	Review C. Young deposition
3/3/10	0.75	Review documents (corporate)
3/3/10	1.00	Phonecon expert
3/5/10	1.00	Review draft reply brief
3/8/10	4.50	Review S. Olafsson deposition
3/8/10	0.75	Review draft reply brief
3/8/10	0.25	Review numerous class committee e-mails
3/9/10	3.00	Travel to PSC meeting
3/10/10	6.00	PSC meeting
3/10/10	3.00	Travel from PSC meeting
3/18/10	2.00	Attend CMC
3/19/10	3.50	Review documents (corporate)
3/22/10	3.25	Review documents (corporate)
3/23/10	0.50	Legal Research re class
3/23/10	0.10	E-mail research to class committee
3/26/10	4.00	Travel to/from J. Shah deposition
3/26/10	6.50	Attend/depose J. Shah
3/29/10	0.75	Draft Shah dep memo

Total Hours 46.85

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

4/1/10	4.75	Review D. Boothe deposition
4/1/10	0.75	Review documents corporate
4/6/10	0.50	Prepare for conf call
4/6/10	1.00	Review day two P. Galea dep
4/6/10	1.00	MDL conference call
4/6/10	0.50	Memo re: conference call
4/7/10	1.25	Review defense discovery responses
4/13/10	1.00	Review J. Shah deposition
4/14/10	3.25	Review M. Sherwani deposition
4/15/10	0.75	Review documents (corporate)
4/26/10	2.75	Review S. Thapar deposition
4/27/10	2.00	Review A. Nigalaye deposition
4/27/10	1.00	Review documents (corporate)

Total Hours 20.50

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

5/4/10	2.50	Review documents (corporate)
5/5/10	2.00	Review D. Patel rough deposition
5/5/10	1.50	Review documents (corporate)
5/5/10	2.00	Travel to NYC
5/6/10	6.00	Attend/depose R. Dowling
5/7/10	4.00	Attend/depose Bitter
5/7/10	0.50	Draft memo re: Dowling
5/7/10	2.00	Travel from NYC
5/7/10	0.50	Draft memo re: Dowling
5/13/10	2.00	Travel to NYC
5/14/10	6.00	Attend/depose Dave
5/14/10	2.00	Travel from NYC
5/14/10	0.50	Draft memo re Dave
5/26/10	2.75	Review PTO 60
5/27/10	0.25	Review inspection e-mails
5/27/10	0.10	Draft inspection e-mail
5/27/10	0.25	Draft memo to Class Action Committee
5/28/10	0.75	Prepare for Class Action Conf call
5/28/10	0.75	Class action conference call
5/28/10	0.75	Draft memo to Class Action Committee
5/28/10	2.50	Legal Research re appeal
5/28/10	1.50	Review JRM memos re appeal

Total Hours 41.10

TIME SHEET FOR JAMES J. PETTIT
DIGITEK

6/1/10	2.50	Legal Research re appeal issues
6/2/10	2.25	Draft initial framework for appellate brief
6/3/10	5.00	Travel to/from plant inspection
6/3/10	3.25	Plant Inspection
6/3/10	1.00	Meeting with expert and P counsel
6/3/10	0.50	Draft memo re inspection
6/4/10	0.75	Review Class Committee Research
6/7/10	2.25	Review draft motion to reconsider
6/7/10	1.00	Review second draft motion
6/8/10	0.25	Review final draft of motion
6/8/10	1.75	Begin review of DB report
6/9/10	2.50	Continue review of DB report
6/17/10	2.00	Review court's opinion on SJ motion (Chambers)
6/17/10	0.25	Memo to PAL
6/21/10	0.25	Begin review of newly produced Actavia documents
6/21/10	0.10	Draft memo to lead counsel
6/21/10	0.10	Phonecon lead counsel
6/22/10	1.00	Review defense response to motion for reconsideration (class)
6/23/10	0.50	Meet PAL/MB re class action
6/23 /10	0.25	Correspondence to Alan Chambers
6/23/10	0.50	Review info re class reps
6/24/10	0.10	Memo to lead counsel
6/24/10	2.75	Review defense documents received
6/24/10	0.25	Phonecon Pete Miller
6/24/10	0.10	Memo to lead counsel
6/24/10	0.25	Meet MB re class reps

Total Hours 31.40

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
10/6/08	.25	Text Order; initial conf. adj.
10/10/08	.25	MDL conditional transfer Order
10/14/08	.40	Atty registration, Notice of atty appearance and counsel contract form for MDL
10/15/08	1	Review PTO #'s 1-3; initial conf.
10/16/08	1.4	Review medical records

Total Hours: 3.30

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
11/3/08	.50	Letter to MDL
11/5/08	.25	Meeting JJP
11/10/08	.30	Amend and file letter to MDL
11/24/08	.25	Emails: JJP

Total Hours: 1.30

TIME SHEET FOR PAMELA A. LEE

DIGITEK

Date	Hours Spent	Description
12/2/08	.35	Review file
12/9/08	.25	Corresp. JJP
12/30/08	.35	Client call

Total Hours: .95

TIME SHEET FOR PAMELA A. LEE

DIGITEK

Date	Hours Spent	Description
1/28/09	.25	Notices of Def. Atty's appearance
1/29/09	.40	Review file

Total Hours: .65

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
2/2/09	.50	Review PTO #4
2/4/09	1	Stipulated Protective Order
2/4/09	.50	State & fed coordination order
2/5/09	1	Protective Order
2/11/09	1	Protective Order
2/17/09	1	Research
2/18/09	1.2	Application to PSC
2/20/09	.40	PSC application submission
2/22/09	3	Research
2/24/09	1.5	Memo: prepare brief

Total Hours: 11.10

TIME SHEET FOR PAMELA A. LEE**DIGITEK**

Date	Hours Spent	Description
3/3/09	1.2	Review Plaintiff Fact Sheet
3/4/09	.25	Mtg. KA
3/5/09	1	Research
3/5/09	1	Case management & scheduling order
3/9/09	.25	Email: JJP
3/9/09	.30	JJP & KA mtg re: PFS
3/13/09	.30	Latest PFS version
3/18/09	1	Review PTO #16; memo to JJP re: class actions
3/20/09	.35	Doc review
3/25/09	.25	Emails: JJP

Total Hours: 5.90

TIME SHEET FOR PAMELA A. LEE

DIGITEK

Date	Hours Spent	Description
4/13/09	1	Electronic discovery
4/15/09	.50	JJP/KA mtg re: PFS & deadlines
4/29/09	.50	Mtg MB re: PFS

Total Hours: 2.0

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
5/4/09	.25	Email: MB
5/12/09	.25	Review Def.'s PFS service instructions
5/14/09	.75	Review medical records
5/14/09	1	Review Completed PFS & docs
5/15/09	.50	JJP mtg
5/19/09	1	Discovery
5/29/09	.35	PSC revisions
5/29/09	1	JJP mtg re: PSC

Total Hours: 5.10

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
6/8/09	1	JJP mtg re: discovery
6/8/09	.75	Review class discovery order and requirements
6/8/09	3	Actavis doc review
6/9/09	.25	Class rep dep notice
6/9/09	2	Review P1's medical records
6/10/09	.30	Memo to JJP re: Palladino records
6/10/09	2	Actavis doc review
6/10/09	.25	PSC mtg agenda
6/11/09	1.20	Review P1's 2 nd set of Rogs to Actavis; P1's 2 nd set of RFP to Actavis; P1's 1 st set of RFA
6/11/09	.75	Review P1's 2 nd set of Rogs and RFP's to Mylan; P1's 1 st set of RFA to Mylan
6/11/09	1	Review P1's mtn for leave to file under seal * mtn to Quash and cross mtn to & Exhibits expand discovery
6/11/09	.40	Review lab testing overview
6/14/09	.25	Memo from JJP re: dep prep
6/15/09	1.20	Call to client
6/15/09	1	Dep prep summary; med record summary
6/16/09	.50	Review PSC's memos
6/16/09	.25	Ltr from PSC to Def.
6/16/09	.25	Review JJP's Memo
6/17/09	.25	Review PTO #24
6/17/09	2.5	Actavis doc review
6/18/09	.25	Trial Pool cases: PTO #25
6/18/09	4	Actavis doc review
6/19/09	.40	Filing under Seal: PTO #26
6/22/09	1.20	Def. Opp brief to P1's cross mtn
6/24/09	.50	JJP mtg
6/24/09	.25	Review PSC memo
6/24/09	3	Actavis doc review
6/25/09	.75	Home Depot Atlanta class action opinion
6/25/09	.25	Call to Def counsel re: consent order
6/25/09	.25	Correspondence betwn Def. counsel and JJP
6/25/09	2.5	Actavis doc review
6/26/09	.30	Prepare consent order
6/27/09	.75	Research Kleinman V. Merck- Med-monitoring case
6/29/09	.25	Corresp. From R. Dean re: consent order
6/29/09	.75	Call to client
6/29/09	.25	PSC- trial selection on cases-corresp.
6/29/09	.75	Mtg JJP
6/29/09	.25	Con w/ def. Michael Anderson re: discovery requested
6/30/09	.50	Memo to JJP
6/30/09	.25	PTO #12 PO signed sent to PSC
6/30/09	.50	Doc. Review training
6/30/09	2.30	Review 483's (def. docs)

6/30/09	.30	Document review mtg
6/30/09	.50	JJP mtg re: MDL document review
6/30/09	.30	Corresp. Betwn JJP and PSC
6/30/09	2.5	Actavis doc review

Total Hours: 42.90

TIME SHEET FOR PAMELA A. LEE**DIGITEK**

Date	Hours Spent	Description
7/1/09	.25	Obtain records
7/1/09	.50	JJP mtg
7/1/09	.50	Doc review
7/1/09	1	PSC Conf. call- class action committee
7/2/09	.75	Mtg w/ JJP re: Def's req. for admissions
7/2/09	4	Actavis doc review
7/2/09	1.30	PTO #27 & 28
7/2/09	.30	Review P1's ans/obj. to Def RFA's venue
7/2/09	.25	Emails re: P1's RFA's responses
7/2/09	.30	Review PTO # 29: Served procedures
7/6/09	.25	JJP memo
7/6/09	.75	Mtg w/ JJP re: Def's brief
7/6/09	.25	Emails re: class actions
7/7/09	1	Amend Complaint
7/7/09	.50	Amended Notice of Deposition
7/7/09	.50	Mtg JJP re: deposition
7/7/09	.25	PSC: LLF's 1 st set rogs & 1 st set RFP-class actions
7/8/09	.25	Corresp. Re: Trial selection
7/9/09	1	Mtg JJP re: class rep.
7/9/09	.25	Corresp. JJP
7/9/09	2	Research
7/10/09	2	Research
7/10/09	.30	File proposed consent order & amended complaint
7/10/09	3	Actavis doc review
7/13/09	.25	Notice of service of PFS
7/13/09	.50	JJP & MB mtg
7/13/09	2.5	Actavis doc review
7/15/09	.25	Review PTO #30: Briefing schedule
7/16/09	.25	Class action PSC list
7/16/09	2.5	Actavis doc review
7/20/09	.25	Corresp. JJP re: discovery
7/21/09	.30	FDA statement
7/21/09	3	Actavis doc review
7/22/09	.25	Emails: Pete Miller
7/22/09	.25	Emails: Def's removal notice
7/22/09	2	Actavis doc review
7/23/09	.60	Review Def's ltr re: tablet inspections & Def's ltr to Judge Stanley
7/23/09	.30	Review PTO #31: Ex. Party and former employees
7/24/09	.60	Review class action discovery requests
7/27/09	.25	Review PTO #32: Class action discovery
		<u>Total Hours: 35.50</u>

TIME SHEET FOR PAMELA A. LEE
DIGITEK

Date	Hours Spent	Description
8/3/09	.90	Review PTO # 33: Review Order re: Def's mtn to dismiss
8/3/09	2.5	Actavis doc review
8/4/09	2.5	Actavis doc review
8/5/09	.55	Review PTO #'s 34 & 35: Review orders re: deceased Pl's medical records & trial pool cases
8/6/09	.25	Review PTO # 36: scheduling order
8/10/09	.40	Review PTO # 37: review opinion re: discovery order
8/12/09	.40	Phone conf Re: mtn to compel & class rep
8/13/09	.30	Review Def.'s letters re: class claims.
8/13/09	.40	Review PTO # 38: revised scheduling order
8/13/09	.50	Mtg. w/ JJP re: Complaint
8/20/09	.70	Review docs
8/20/09	1	Discussions/corresp. Re: depositions; review
8/24/09	.25	Corresp. JJP re: discovery
8/26/09	.40	Review PTO # 39: rule 11 discovery

Total Hours: 11.05

TIME SHEET FOR PAMELA A. LEE**DIGITEK**

Date	Hours Spent	Description
9/8/09	.25	Register for doc review training
9/10/09	.25	Corresp re: doc review training
9/14/09	.25	Doc review training details
9/15/09	.40	Def's lone pine motion
9/15/09	.25	Order re: Def's response to Pl's obj. to PTO # 39
9/16/09	.30	Discussion re: depositions
9/17/09	9	Doc review training; doc review
9/18/09	.80	Mtg. JJP
9/18/09	.30	Emails: PSC
9/18/09	.25	Review PTO # 40: Trial group 1
9/19/09	1	Memo re: doc review
9/21/09	3	Doc review – Mylan; Evangelina
9/21/09	.30	Review ltr to Actavis re: discovery deficiencies
9/23/09	.50	JJP corresp. Re: deposition
9/23/09	.30	M. Carter corresp re: PTO # 27 & discovery
9/23/09	.25	Order re: appeal of PTO # 39
9/24/09	.30	Review draft mtn
9/24/09	3	Document review: Mylan, Evangeline

Total Hours: 20.70

TIME SHEET FOR PAMELA A. LEE
DIGITEK

10/5/09	.40	Review D's Reply Lone Pine motion
10/9/09	1.50	Review dep transcript
10/9/09	.25	Emails re: clawback docs
10/14/09	.25	Dep notices
10/14/09	1.25	Review Actavis' Opp to Ps Mtn to Cmpl
10/15/09	1	Review PTO's #41, #52, #43 and #44
10/16/09	.25	JJP Memo
10/22/09	.35	Review documents
10/23/09	1	Review documents (corporate)
10/30/09	.25	Review PSC emails and attached order

Total Hours: 6.50

TIME SHEET FOR PAMELA A. LEE
DIGITEK

11/3/09	.25	PSC emails re: class action
11/5/9	1	Review class action MDL transcripts
11/6/09	.30	JJP Memo
11/13/09	2	Review documents (corporate)
11/13/09	.60	Opinion and Order re: P's mtn to compl
11/13/09	.50	Review PSC Memo; emails re: class action
11/16/09	.50	Mtg JJP re: class cert
11/16/09	3	Research – class cert
11/17/09	.25	Mtg JJP re: class brief
11/17/09	.30	JJP memo
11/18/09	.50	PSC memo re: class cert
11/25/09	.25	PTO #47
11/30/09	2	Review documents (corporate)

Total Hours: 11.45

TIME SHEET FOR PAMELA A. LEE
DIGITEK

12/15/09	.25	PSC Emails re: D's letters
12/18/09	.25	PSC Emails re: experts
12/18/09	.25	PTO #48
12/28/09	.25	PSC Emails re: depositions

Total Hours: 1.00

TIME SHEET FOR PAMELA A. LEE
DIGITEK

1/8/10	.25	PSC Emails and Letters
1/9/10	1.30	Opinion and Order – Lone Pine
1/11/10	.35	Review PSC Memo
1/20/10	3	Document Review (corporate)
1/21/10	2	Document Review (corporate)
1/22/10	1	Research – Mayer Decision
1/22/10	2	Review class cert brief

Total Hours: 9.90

TIME SHEET FOR PAMELA A. LEE
DIGITEK

2/3/10	2	Document review (UDL corporate)
2/ 2/10	1	PSC Mtg re: Actavis docs
2/3/10	1	Research – Baby Bath Products Decision
2/4/10	.25	Memo to JJP re: PSC Mtg
2/5/10	.25	PSC Emails re: depositions
2/9/10	.25	PTO #51
2/11/10	1.25	Opinion and Order re: Self Critical Analysis
2/16/10	.25	PSC Emails re: hearings
2/20/10	1	Review Ds MSJ
2/24/10	1	Research: class cert
2/25/10	.25	PTO #54
2/26/10	.25	JJP Memo re: class cert reply
2/26/10	.25	PSC Emails re: class reply brief

Total Hours: 9.00

TIME SHEET FOR PAMELA A. LEE**DIGITEK**

3/1/10	4	Review MDL dep transcripts
3/10/10	.25	PTO #55 and #56
3/10/10	1	Mtn to Extend Chamber's Reply
3/12/10	.25	Order re: extension
3/19/10	1.25	Review Opp to MSJ
3/22/10	1.50	Research and Review In re Mercedes Benz ruling
3/22/10	.25	Review Court's ltr re: expert deadlines
3/26/10	PTO #57	

Total Hours: 8.50

TIME SHEET FOR JONATHAN MILLER
DIGITEK

6/18/09	4.00	Legal Research on Class Action Choice of Law in WV a after removal
6/19/09	5.25	Legal Research on Class Action Choice of Law in WV a after removal

Total Hours: 9.25

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
4/15/09	1.0	Review PFS w/client
4/29/09	.50	Mtg PAL re: PFS
4/29/09	1.0	Prepared PFS & sent to client

Total Hours: 2.05

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
5/4/09	.25	Email: PAL
5/4/09	.50	Rec'd completed PFS
5/12/09	.25	Review Def.'s PFS service instructions
5/14/09	.75	Review medical records
5/14/09	1	Completed PFS & docs
5/15/09	.50	JJP mtg
5/15/09	1	Prepared & sent PFS to D's

Total Hours: 4.25

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
6/15/09	2	Review P's medical records
6/24/09	.50	JJP mtg
6/24/09	.25	Review D's discovery docs
6/29/09	.25	Revise PFS
6/29/09	.25	Review JJP memo re: dep prep
6/29/09	3	Summarize medical recs for dep
6/30/09	.50	Doc. Review training
6/30/09	.50	JJP mtg re: MDL document review
6/30/09	4	Summarize medical recs for dep

Total Hours: 11.25

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
7/2/09	.25	Mtg JJP re: dep prep
7/9/09	.25	Mtg JJP/PAL re: Palladino dep prep
7/10/09	.50	Mtg JJP/PAL re: Palladino
7/13/09	.50	JJP/PAL mtg
7/20/09	1	Review disc w/production
7/21/09	.25	FDA statement research
7/22/09	.25	D's pleadings research (Notice of Removal)

Total Hours: 3.0

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
8/10/09	2	Review PFS - Chambers
8/10/09	.25	Mtg JJP/PAL
8/10/09	1	Mtg w/client re: PFS
8/10/09	1	Prepare amended complaint
8/12/09	2	Complete PFS - Chambers
8/13/09	1	Obtain medical recs - Chambers
8/13/09	1	Review & sign PFS
8/13/09	.50	Mtg JJP/PAL re: Chambers
8/14/09	.50	Mtg JJP/PAL re: Chambers
8/14/09	2	Prepare & serve PFS

Total Hours: 11.25

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

Date	Hours Spent	Description
9/3/09	.50	Mtg JJP/PAL re: Chambers
9/8/09	1	Review docs - corporate
9/14/09	1	Review docs - corporate
9/15/09	2	Review docs for dep – Chambers
9/17/09	1	Doc review training
9/22/09	1.50	Review docs - corporate

Total Hours: 7.0

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

10/5/09	2	Review docs – corporate
10/16/09	1.50	Review docs - corporate

Total Hours: 3.5

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

11/3/09	.10	Mtg JJP re: docs
11/10/09	1	Review docs – corporate
11/17/09	2	Review docs – corporate

Total Hours: 3.10

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

12/2/09	1.50	Review docs – corporate
12/7/09	1	Review docs – corporate
12/17/09	2	Review docs – corporate

Total Hours: 4.50

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

1/7/10	2	Review docs – corporate
1/7/10	.25	Mtg JJP re: exhibits
1/8/10	2	Review docs – corporate
1/12/10	2	Review docs – corporate

Total Hours: 6.25

TIME SHEET FOR MICHELLE BLAZZO
DIGITEK

2/1/10	1	Mtg JJP re: docs
2/1/10	2	Review docs – corporate
2/4/10	.50	Mtg JJP re: docs
2/4/10	2	Review docs – corporate
2/5/10	1	Review docs – corporate
2/9/10	2	Review docs – corporate
2/16/10	1	Shah dep prep
2/23/10	1	Shah dep prep

Total Hours: 10.50

TIME SHEET FOR MICHELLE BIAZZO
DIGITEK

3/24/10	1	Review docs – corporate
3/25/10	1	Review docs – corporate
3/25/10	1	Crivella West training

Total Hours: 3

LOCKS LAW FIRM, LLC

**TOTAL DIGITEK MDL
COMMON BENEFIT COSTS
AS OF 8/26/2010**

\$34,982.81

	A	B	C	D	E	F	G	H	I	J	K
1	Palladino, George (2NJ2847)										
2	Matter	Date	ExpCd	Amount	Narrative						
3	0	8/5/2008	2LTC	20.00	MICHAEL GALPERN; Invoice # 080508; LOCAL TRAVEL						
4	0	8/31/2008	2MDE	100.00	ASSOCIATED CARDIOVASCULAR CONSULTANTS; Invoice # 083108; MED						
5	0	9/16/2008	2MDE	5.00	WAL-MART STORES, INC.; Invoice # 2008-40511; MEDICAL EXPENSE						
6	0	9/16/2008	2MDE	662.34	HEALTHPORT; Invoice # 0049825058; MEDICAL EXPENSES						
7	0	12/9/2008	2OTT	455.33	MICHAEL GALPERN; Invoice # 120908; OUT OF TOWN TRAVEL						
8	0	12/15/2008	2OTT	120.00	MICHAEL GALPERN; Invoice # 121508; OUT OF TOWN TRAVEL						
9	0	2/24/2009	2LTC	30.80	ROSENBLUTH VACATIONS ; Invoice # 022409; LOCAL TRAVEL						
10	0	3/17/2009	2PST	49.95	NEW JERSEY LAWYERS SERVICE; Invoice # 031709; POSTAGE						
11	0	5/27/2009	2PST	45.67	UPS; Invoice # 8R44X1219; POSTAGE						
12	0	6/8/2009	2LTC	562.33	JAMES J PETTIT; Invoice # 060809; LOCAL TRAVEL						
13	0	6/23/2009	2CST	25000.00	DIGITEK MDL 1968 PCS; Invoice # 062309; CLIENT EXPENSES						
14	0	7/13/2009	2PST	11.06	UPS; Invoice # 8R44X1279; POSTAGE						
15	0	7/20/2009	2PST	14.80	UPS; Invoice # 8R44X1289; POSTAGE						
16	0	8/6/2009	2CPY	63.90	LISA COOK; Invoice # 080609; COPYING COSTS						
17	0	8/13/2009	2MDE	15.00	RECORDTRAK; Invoice # 5024856; MEDICAL EXPENSES						
18	0	8/27/2009	2CST	12.74	PAETEC ; Invoice # 4370472; CLIENT EXPENSES						
19	0	9/8/2009	2LTC	1867.93	JAMES J PETTIT; Invoice # 090809; LOCAL TRAVEL						
20	0	10/19/2009	2MDE	30.00	RECORDTRAK; Invoice # 55033588; MEDICAL EXPENSES						
21	0	1/4/2010	2MDE	15.00	RECORDTRAK; Invoice # 5043227; MEDICAL EXPENSES						
22	0	1/19/2010	2PST	26.35	UPS; Invoice # 8R44X1020; POSTAGE						
23	0	3/16/2010	2PST	15.23	UPS; Invoice # 8R44X1100; POSTAGE						
24				200.00	Complaint						
25											
26		SUBTOTAL		29323.43							

	A	B	C	D	E	F	G	H	I	J	K
1	Chambers, Alan (2NJ29076)										
2	Matter	Date	ExpCd	Amount	Narrative						
3	0	9/9/2009	2MDE	162.75	PDQ X-PRESS COPY SERVICE; Invoice # 7168; MEDICAL EXPENSES						
4	0	9/9/2009	2MDE	115.00	RECORDS REPRODUCTION SERVICE; Invoice # 090909; MEDICAL EXPE						
5	0	10/12/2009	2LTC	186.00	ROSENBLUTH VACATIONS ; Invoice # 101209; LOCAL TRAVEL						
6	0	10/19/2009	2MDE	60.00	RECORDTRAK; Invoice # 55033588; MEDICAL EXPENSES						
7	0	12/10/2009	2MDE	45.00	RECORDTRAK; Invoice # 5038419; MEDICAL EXPENSES						
8	0	12/22/2009	2OTT	149.50	ROSENBLUTH VACATIONS ; Invoice # 122209; OUT OF TOWN TRAVEL						
9	0	1/4/2010	2MDE	60.00	RECORDTRAK; Invoice # 5043227; MEDICAL EXPENSES						
10	0	1/5/2010	2LTC	68.00	JAMES J PETTIT; Invoice # 010510; LOCAL TRAVEL						
11	0	1/19/2010	2LTC	143.75	CROWNE PLAZA HOTEL AND RESORTS; Invoice # 011910; LOCAL TRAV						
12	0	2/15/2010	2PST	15.09	UPS; Invoice # 8R44X1060; POSTAGE						
13	0	2/18/2010	2OTT	681.02	JAMES J PETTIT; Invoice # 021810; OUT OF TOWN TRAVEL						
14	0	3/4/2010	2OTT	211.70	CHARLESTON HARBOR RESORT & MARINA; Invoice # 030410; OUT OF						
15	0	3/4/2010	2OTT	754.10	ROSENBLUTH VACATIONS ; Invoice # 03042010; OUT OF TOWN TRAVE						
16	0	3/16/2010	2PST	21.44	UPS; Invoice # 8R44X1100; POSTAGE						
17	0	3/23/2010	2OTT	371.00	ROSENBLUTH VACATIONS ; Invoice # 032310; OUT OF TOWN TRAVEL						
18	0	4/1/2010	2MDE	15.00	RECORDTRAK; Invoice # 5056479; MEDICAL EXPENSES						
19	0	5/3/2010	2OTT	282.00	ROSENBLUTH VACATIONS; Invoice # 050310; OUT OF TOWN TRAVEL						
20	0	5/8/2010	2PST	67.16	POSTAGE UPS INV # 8R44X1190						
21	0	5/13/2010	2OTT	297.00	ROSENBLUTH VACATIONS; Invoice # 051310; OUT OF TOWN TRAVEL						
22	0	7/8/2010	2OTT	1953.87	JAMES J PETTIT; Invoice # 070810; OUT OF TOWN TRAVEL						
23											
24		SUBTOTAL		5659.38							

LOCKS LAW FIRM, LLC

**TOTAL DIGITEK MDL
COMMON BENEFIT COSTS
AS OF 8/26/2010**

\$34,982.81

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22	0	1/19/2010	2PST	26.35	UPS; Invoice # 8R44X1020; POSTAGE						
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7	0	12/10/2009	2MDE	45.00	RECORDTRAK; Invoice # 5038419; MEDICAL EXPENSES						
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23											
24		SUBTOTAL		5659.38							

THE STATE OF TEXAS

§

§

COUNTY OF HARRIS

§

1. My name is Shelly A. Sanford. I am a Court appointed member of the Plaintiff's Steering Committee in MDL 1968. I am a lawyer, licensed in the State of Texas and in good standing since 1992. Attached is my firm's time and expenses in the Digitek MDL above. The hourly rates are calculated at our firm's standard hourly rates.
2. The total of the time submission is \$217,233.25.
3. The total hours of the time submission is 630.95

Attorney	Hours	Rate	Total
Shelly A. Sanford PSC Member and Partner	210.1	\$500	\$105,050.00
Alex Barlow Partner	55	\$410	\$22,550.00
Anthony Coveny Associate	365.85	\$245	\$89,633.25
Total	630.95		\$217,233.25

4. The total of the common expenses submission is \$12,663.24, not including PSC assessments. The itemization is attached.
5. The total PSC assessments paid were \$25,000.00.
6. I have not included any time that was not spent for the common benefit of the cases in the MDL. Included in the time submission are PSC meetings that were held for purposes of discussing case strategy (30.15 hours); discussions with experts and potential experts (28.19 hours); discussions relating to selection or de-selection of trial plaintiffs in the trial pool (81.95 hours); document review for the purposes of depositions (223.68 hours); deposition preparation (215.48 hours); and the taking of certain depositions or assisting others in taking depositions (51.5 hours).

7. I am familiar with the relevant MDL standards for time and expense submissions and have served on an MDL fee committee. I have received common benefit time and expense awards. It is my belief that the time and expense submission hereto meets or exceeds the standards of MDL practice and includes only such time and expenses as further benefited the outcome of this matter for all claimants.
8. True and correct copies of the time and expenses are attached.

SIGNED this 9th day of February, 2011.

Shelly A. Sanford
Shelly A. Sanford, Affiant

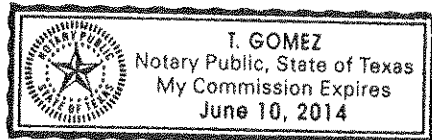
THE STATE OF TEXAS

§
§
§

COUNTY OF HARRIS

Sworn to and subscribed to before me on 9th day of February 2011 by **Shelly A. Sanford.**

T. Gomez
Notary Public in and for
the State of Texas



My commission expires: June 10, 2014

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

August, 2008 FIRM NAME: Shelly A. Sanford PLLC INDIVIDUAL NAME: Shelly Sanford

ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
08/26/08	Digitek organizational meeting in Chicago; travel to Chicago; meeting other potential committee members on cases and strategy	9.8	\$4,900.00
08/27/08	Travel from Chicago to Houston	4.25	\$2,125.00
Total		14.05	\$7,025.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

October, 2008 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
10/09/08	Travel to West Virginia for Digitek meeting; meeting with case leadership co-counsel on PSC issues and case strategy	10.0	\$5,000.00
10/10/08	Travel from West Virginia to Houston	3.80	\$1,900.00
Total		14.1	\$6,900.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

January, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
01/30/09	Prepared for and participated in Digitek PSC call; Conference with entire Plaintiffs' Steering Committee	1.25	\$625.00
Total		1.25	\$625.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

May, 2009 FIRM NAME: Shelly A. Sanford PLLC INDIVIDUAL NAME: Shelly Sanford

☒ ATTORNEY
 ☐ PARALEGAL
 ☐ LAW CLERK
 ☐ OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
05/11/09	Prepared for and participated in Digitek PSC call; discussed selection of document vendor, trial selection cases and review, Plaintiff Fact Sheets, 30(b)(6) depositions and Response to 12(b)(6) motions	1.0	\$500.00
05/14/09	Communicated with Meghan Johnson regarding case issues	0.5	\$250.00
05/15/09	Correspondence with Harry Bell regarding PSC issues	.15	\$75.00
Total		1.65	\$825.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

June, 2009 FIRM NAME: Shelly A. Sanford PLLC INDIVIDUAL NAME: Shelly A. Sanford


 ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)
Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
06/11/09	Participated in Houston Digitek PSC meeting. Discussed trial case selection, fact discovery, deposition schedules, experts, testing and other discovery matters' preparation for meeting	7.0	\$3,500.00
06/11/09	Dinner meeting and introduction of John O'Quinn to Fred Thompson	3.25	\$1,625.00
06/17/09	Prepared for and attended Digitek telephonic conference	1.0	\$500.00
06/30/09	Digitek document review training	0.2	\$100.00
Total		11.45	\$5,725.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

July, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly A. Sanford**

☒ ATTORNEY
 ☐ PARALEGAL
 ☐ LAW CLERK
 ☐ OTHER
 (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
07/01/09	Meeting with Fred Thompson regarding trial cases and discussion of issues relating to trial selection cases; travel with J. Williamson to Mt. Pleasant SC for Thompson meeting and return same day to Houston	12.40	\$6,200.00
Total		12.40	\$6,200.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

September, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly A.**

Sanford

 **ATTORNEY** PARALEGAL LAW CLERK OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
09/24/09	Vega deposition; preparation; conferred with co-counsel and consulting expert on the case	6.25	\$3,125.00
Total		6.25	\$3,125.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

October, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

 ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)
Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
10/19/09	Travel to New York for PSC meeting; participated in PSC meeting; discussed scheduling, outstanding motions, Rule 11 issues, discovery, liability/causation case, trial and class action	7.80	\$3,900.00
10/20/09	Attended and assisted co-counsel in deposition of Patel; meeting with co-counsel regarding deposition issues; document assistance	8.45	\$4,225.00
10/21/09	Attended and assisted in deposition of Murphy; meeting with co-counsel regarding depositions and issues	6.80	\$3,400.00
10/22/09	Travel from Newark back to Houston	4.30	\$2,150.00
Total		27.35	\$13,675.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

November, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

 ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)
Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
11/04/09	Telephonic meeting with Alex Barlow and Fred Thompson regarding experts; prepared for same	1.20	\$600.00
11/18/09	Prepared for and attended PSC expert call with Dr. Nelson and other PSC members; discussed toxicity, therapeutic ranges and kidney issues	2.50	\$1,250.00
11/20/09	Attended status conference on trial cases and Vega case via telephone; email communications with Megan Johnson regarding same; reviewed Dr. Furman's expert consultant opinions	2.00	\$1,000.00
11/24/09	Participated in Digitek PSC conference call	0.60	\$300.00
Total		6.30	\$3,150.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

December, 2009 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

☒ ATTORNEY
 ☐ PARALEGAL
 ☐ LAW CLERK
 ☐ OTHER
 (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
12/10/09	Outline for A. Coveny documents needed for upcoming depositions of key witnesses; internet research and investigation of witnesses Swapan Roychowdhury and Rick Dowling; began deposition outlines	7.60	\$3,800.00
12/11/09	Prepared for deposition of Rick Dowling and Swapan Roychowdhury	9.00	\$4,500.00
12/12/09	Prepared for deposition of Rick Dowling and Swapan Roychowdhury	9.00	\$4,500.00
12/13/09	Continued to prepare for depositions of Jisheng Zhu, Swapan Roychowdhury and Rick Dowling; prepared and boxed the file	12.30	\$6,150.00
12/14/09	Travel to New York for depositions; continued preparation for depositions	11.25	\$5,625.00
12/15/09	Took deposition of Swapan Roychowdhury; meeting with co-counsel about deposition and preparation for Dowling's deposition	13.80	\$6,900.00
12/16/09	Deposition of Rick Dowling and assisted F. Thompson on his questions	9.50	\$4,750.00
12/17/09	Travel from Newark back to Houston	4.20	\$2,100.00
Total		76.65	\$38,325.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

February, 2010 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

☒ ATTORNEY
 ☐ PARALEGAL
 ☐ LAW CLERK
 ☐ OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
02/08/10	Prepared for taking Doug Boothe's deposition; outline key documents with A. Coveny for deposition questions	9.40	\$4,700.00
02/09/10	Prepared for Doug Boothe's deposition; Research on same; forwarded file, outline and documents to F. Thompson via overnight delivery due to snowstorm; communicated with counsel on deposition cancellation due to travel ban; multiple calls to U.S. Attys office in D.C. relating to their Doug Boothe investigation	7.80	\$3,900.00
02/10/10	Continued to prepare for Doug Boothe's deposition	7.25	\$3,625.00
02/11/10	Participated in Digitek PSC call	0.75	\$375.00
Total		25.20	\$12,600.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

March, 2010 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)**Time Chart**

Date	Description of Activity	Time	Hourly Rate \$500/hr
03/09/10	Travel to South Carolina for PSC Meeting; met with co-counsel	3.5	\$1,750.00
03/10/10	Attended PSC meeting; discussed depositions, document review, scope of discovery, liability case packaging , and experts; Travel from South Carolina to Houston	8.75	\$4,375.00
Total		12.25	\$6,125.00

**MDL -1968 IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION MONTHLY TIME
DETAIL REPORT**

Attachment "A" FOR MONTH:

April, 2010 FIRM NAME: **Shelly A. Sanford PLLC** INDIVIDUAL NAME: **Shelly Sanford**

ATTORNEY PARALEGAL LAW CLERK OTHER (circle one)

Time Chart

Date	Description of Activity	Time	Hourly Rate \$500/hr
04/08/10	Prepared and participated in conference call with PSC members to discuss trial cases, expert reports, and deadlines	1.2	\$600.00
Total		1.2	\$600.00

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

Reporting Period From: 06/01/08 **To:** 06/30/08

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	\$ 54.84
Printing and photocopying (in-house)	
Computerized research – Lexis/Westlaw	
Telephone – long distance (actual charges only)	
Travel	
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	\$ 54.84

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: Shelly A. Sanford

Date: _____

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

Reporting Period From: 08/01/08 **To:** 08/31/08

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	
Printing and photocopying (in-house)	
Computerized research -- Lexis/Westlaw	
Telephone -- long distance (actual charges only)	
Travel	\$ 1684.90
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	\$ 1684.90

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**MDL 1968 DIGITEK PRODUITS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**


Reporting Period From: 07/01/09 To: 07/31/09

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	
Printing and photocopying (in-house)	
Computerized research – Lexis/Westlaw	
Telephone – long distance (actual charges only)	
Travel	1185.09
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	1185.09

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

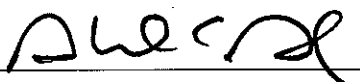
Reporting Period From: 10/01/09 **To:** 10/31/09

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	
Printing and photocopying (in-house)	
Computerized research – Lexis/Westlaw	
Telephone – long distance (actual charges only)	
Travel	2210.75
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	2210.75

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

Reporting Period From: 12/01/09 **To:** 12/31/09

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	
Printing and photocopying (in-house)	
Computerized research – Lexis/Westlaw	
Telephone – long distance (actual charges only)	
Travel	4044.96
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	4044.96

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

Reporting Period From: 01/01/10 **To:** 01/31/10

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	31.99
Printing and photocopying (in-house)	
Computerized research – Lexis/Westlaw	
Telephone – long distance (actual charges only)	
Travel	807.90
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	839.89

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**MDL 1968 DIGITEK PRODIUTS LIABILITY LITIGATION COMMON HELD COSTS
AND EXPENSES**

Reporting Period From: 03/01/10 **To:** 03/31/10

Firm Name: Shelly A. Sanford PLLC

CLIENT COSTS/EXPENSES	TOTAL
Telefax charges	
Postage, shipping, courier, certified mail	
Printing and photocopying (in-house)	
Computerized research -- Lexis/Westlaw	
Telephone -- long distance (actual charges only)	
Travel	1355.11
Other (please itemize, on attached sheet if necessary)	
TOTAL COSTS	1355.11

*Please attach documentation for each expense reported.

I certify that these expenses are properly documented, complete and accurate and have been incurred for the common benefit.

Signature: 

Date: _____

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION

MDL NO. 1968

THIS DOCUMENT RELATES TO ALL CASES

I, FRED THOMPSON, III, being duly sworn, depose and say:

1. My name is Fred Thompson. I am an attorney in Mount Pleasant, South Carolina, and have been licensed to practice law since 1979. I am a member of Motley Rice, LLC, and I am the practice group leader of the pharmaceutical litigation department.

2. I have been actively involved in numerous complex and multidistrict litigations throughout the United States, including for example: *Avandia*, *Trasylol*, *Kugel Mesh*, *Zicam*, *Vioxx*, *Hydroxycut*, *Medtronic Sprint Fidelis* and *Avaulta Mesh*. My law firm, Motley Rice, LLC, has been involved in numerous mass tort litigations and enjoys a preeminent reputation in litigation of complex and mass tort consolidations. The firm has been in leadership roles in asbestos, tobacco, air crash, commercial, securities, and environmental cases, as well as pharmaceutical and medical device litigation.

3. I was appointed as Co-Lead Counsel and as a member of the Plaintiffs' Steering Committee in this MDL by Order of this Court (PTO #4) dated November 5, 2008. Since that time, I and Motley Rice, LLC attorneys Meghan Carter and Carmen Scott have worked diligently to help secure a fair and just resolution of Digitek claims by, *inter alia*, performing the following tasks:

- a. Acting as co-lead counsel for all attorneys involved in the Digitek MDL, including

- i. Appearing at status conferences and hearings;
 - ii. Setting up a call-in number for MDL Counsel to participate in status conferences;
 - iii. Keeping the Court updated.
- b. Serving as a point person for the Plaintiffs' Steering Committee to answer questions from MDL counsel. This included
 - i. Hosting, moderating and updating email listserv for all plaintiffs counsel in the MDL;
 - ii. Answering questions including daily emails concerning topics such as pill testing, Plaintiff's fact sheets, liability and causation;
 - iii. Drafting and circulating updates concerning the litigation;
 - iv. Tracking the MDL docket and keeping relevant parties notified of filings;
 - v. Organizing all conference calls with MDL Counsel and the PSC
 - vi. Handling all mailings including those to state counsel and notifications concerning the settlement.
- c. Serving as point person for State Litigation, including
 - i. After securing permission and relevant protective orders, distributing deposition transcripts and videos free of charge.
 - ii. Answering questions concerning our status
 - iii. Coordinating to prevent duplicative discovery.
- d. Organized Committees including

- i. Organized and lead all PSC meetings and calls
 - ii. Having a leadership role on all sub-committees including discovery committee, science and expert committee, law and pleadings committee and class action committee.
 - iii. Organizing and conducting all sub-committee meetings.
 - iv. Appearing at Court status conferences, and at contested motion hearings to represent the PSC positions before the Court.
- e. Maintaining cordial and collegiate relationship with defense counsel, facilitating an open relationship that allowed for successful negotiation of most issues and Pre-trial orders.
- f. Serving on law and pleadings sub-committee, including
 - i. Drafting master complaint
 - ii. Conducting legal research
 - iii. Drafting or editing almost every motion including motions to compel, responses to motions to dismiss and other various motions
 - iv. Responding to Defendants' motions or pleadings
 - v. Coordinating and drafting responses to Court's requests including information concerning severance.
- g. Serving on discovery sub-committee and instrumental in all discovery including
 - i. Negotiating Plaintiff's fact sheet
 - ii. Scheduling all depositions

- iii. Preparing for and conducting the depositions of liability fact witnesses from Defendant Actavis and Mylan, including
 - 1. Document review and collection for every deposition
 - 2. Participated in preparation or attended every deposition.
- iv. Drafted or organized all discovery including interrogatories and requests for production
- v. Organized the inspection of Actavis' facilities;
- h. Interviewing service providers and contracting with Crivella West for the document review platform. Our office also managed the document review platform including
 - i. Creating multiple platforms including one for MDL participants, one for PSC members, one for experts and one for the Philadelphia litigation. Organized and uploaded documents to the review platform.
 - ii. Distributing and keeping track of the Protective Order, and issuing usernames and passwords for the document review platform.
 - iii. Answering questions and conducting numerous training sessions on the platform.
- i. Coordinating and retaining experts including
 - i. Working closely with Pete Miller to retain all experts
 - ii. Scheduling meetings with expert committee and with experts
 - iii. providing documents to experts
 - iv. securing reports from experts

- v. preparing for and appearing at all expert depositions
- j. Negotiating settlement.
 - i. Conducting settlement negotiations with Defendants
 - ii. Updating MDL participants on status of negotiations and final settlement
 - iii. Serving as point person for settlement participants and special master.
- k. Helping Counsel for the cases that Opted-out continue and take over the litigation
 - i. We have kept up our involvement even though we no longer have any cases that are moving forward.

4. The number of hours for the work performed by Motley Rice, LLC for the common benefit of all Digitek MDL claimants and their attorneys is as follows:

Time Keeper	MDL Hours	Class Hours
Fred Thompson (Partner)	1821	25
Carmen Scott (Senior Associate at the time of work)	323.55 (including 225 for trial case)	
Meghan Carter (Associate)	3,534.65 (including 42.1 for trial case)	103.05
Mitch Thornton (law clerk at the time of work)	103.40	
Sandy Summers (paralegal)	259.95	

5. Billing detail of time claimed is attached hereto as Exhibit 1. All of the time claimed by Motley Rice, LLC timekeepers was for work performed for the common benefit of all Digitek MDL claimants and their attorneys. Time relating to the Digitek class action lawsuit is attached separately as Exhibit 2. Time relating to our firm's trial case *Fox v. Actavis Totowa LLC et al* (Decedent is Joan Luce) is attached separately as Exhibit 3.

6. Timekeepers Meghan Carter and Carmen Scott performed work as associate attorneys at Motley Rice (Carmen Scott has since been promoted to Member), and Fred Thompson is a member attorney at Motley Rice. Sandy Summers was a paralegal at Motley Rice and has since retired. Mitch Thornton is a licensed lawyer at Motley Rice. The hours claimed herein are conservative and no hours are claimed for which the work was not performed. Every effort has been made to insure that multiple billings are not claimed.

7. This affiant is informed and believes that in applying *Johnson v. Ga. Hwy Express, Inc.*, 488 F2d 714 (5th Cir 1974), these hours meet accepted criteria for being eligible for enhancement. The work performed by affiant and his associates was efficient, was designed to allow the collection of vital information needed to evaluate the strengths and weaknesses of the case, and to meet the Court's expectations. The work performed led to early discussions with defendants and permitted a settlement that addressed the numbers of events, severity, and liability issues presented. The settlement was fashioned to allow claimants who could prove use of a recalled tablet, and could show a digoxin related injury to share in the settlement pool on a gridded basis. Given the issues relating to proof of defect and liability, this settlement was fair, was in the best interests of all parties, and because it was efficiently negotiated and performed, the resolutions resulted in net savings for all parties including defendants and early compensation for all injured plaintiffs.

8. Although the PSC was quite numerous at the outset, when the case required heavy investment of time and effort due to discovery demands and deposition schedule, and when issues of defect and liability emerged, a core group of members put shoulders to the wheel to permit the case to be brought to settlement. In particular, this affiant recognizes his co-leads, and fellow PSC members Pete Miller; Ed Blizzard; Shelly Sanford; James Petit; Shamus Mulderig and Pat Avery (for Lester Levy). Although Ms. Avery's work was largely in the class issues, she was indefatigable in legal issues and feedback. In addition, Crivella West was engaged on very low cash flow terms, and this affiant believes that their expense claim should be recognized for additional payments which were deferred from the month by month billings paid.


9. In addition to the hours and work expended for which Motley Rice seeks compensation, Motley Rice LLC incurred \$170,061.51 in expenses for the common benefit of all Digitek MDL claimants and their attorneys, for, *inter alia*, travel related to PSC/ co-lead counsel duties, cost of conference calls, cost to run listserv, pacer/ecf costs, research costs, mailings, and the PSC assessment of \$25,000. We have also included \$12,634.68 for our trial case expenses as this case helped further the MDL as a whole. A listing of all held expenses for which reimbursement is claimed is attached hereto as exhibit 4. A listing of all expenses related to our trial cases is attached hereto as exhibit 5. A listing of expenses related to the class action sub-committee is attached hereto as Exhibit 6.

10. As an additional Expense to that set out above, although the treasury of the PSC was substantially exhausted, due to the pendency of the settlement discussions and the period of enrollment of clients an additional second assessment was not politic. During this period of low operating PSC funds, Motley Rice LLC also covered many expenses that would have been covered

by the PSC treasury if there had been a second assessment. This includes expert witness fees and costs, deposition fees and costs, deposition transcripts for distribution to MDL participants, cost of committee meetings, and other various items. The total amount of these MDL expenses is \$259,935.31. The PSC treasury has already reimbursed Motley Rice LLC \$69,633.53. Thus, the total common fund Expense incurred by Motley Rice, LLC, giving all just credits, and adding all just debits, is \$190, 301.78. A listing of all MDL expenses for which reimbursement is claimed is attached hereto as exhibit 7.

11. We have not included a suggested hourly amount for our time and leave it to the Court's discretion to award a reasonable rate. Therefore we have not suggested a fee award. The total expenses for Motley Rice LLC is \$372,997.98.


FURTHER AFFIANT SAYETH NOT.


Fred Thompson, III

[illegible]

The foregoing Affidavit of Fred Thompson, III, Esquire was sworn and subscribed to before me this 15th day of February 2011, by Fred Thompson, III, Esquire

WITNESS MY HAND AND OFFICIAL SEAL.

OFFICIAL SEAL.


 Notary Public

(seal)

My commission expires: 5/21/2011

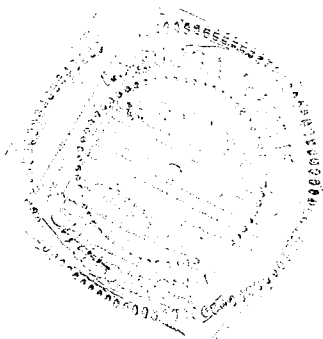


EXHIBIT 1

Date	Description	Time
8/14/2008	Receipt of Order assigning case to Judge Goodwin of West Virginia Southern Dist.; Conference with co-counsel re: procedures	1.3
8/19/2008	Travel to Wheeling, WV (via Pittsburgh) for co-counsel meeting.	4.6
8/20/2008	Prepare for and Attend co-counsel meeting. Return to Charleston, SC.	7.6
8/21/2008	Review PTO number 1 as signed by Judge Goodwin.	0.6
8/25/2008	Travel to Chicago, IL for co-lead meeting. Prepare for meeting	11
8/26/2008	Prepare for and Attend meeting; travel home.	10.1
9/8/2008	Draft and revise Application for Lead Counsel. Review applications recently submitted by other counsel.	2.6
9/14/2008	Review Conditional Transfer Orders and Notices of New Cases Opened	0.6
9/18/2008	Conference call with co-counsel re: experts and status conference	1.6
9/19/2008	Travel to Pittsburgh for meeting with co-counsel and potential expert.	4.6
9/20/2008	Prepare for and Attend meeting; travel home.	8.2
9/26/2008	Conference call with co-counsel re: PTO #2.	0.7
9/28/2008	Agenda for hearing; conference call with co-counsel.	0.9

Fred Thompson. Motley Rice LLC

Digitek MDL

9/29/2008	E-mail from opposing counsel; Review application for liaison counsel recently submitted and conference call with co-counsel	1.6
10/9/2008	Travel to Charleston, WV for PSC meeting. Prepare for and attend meeting.	11
10/10/2008	Prepare for and attend status conference. Travel home.	10
10/11/2008	Review PTO number 3.	0.6
10/14/2008	Emails back and forth from Harry Bell and defense counsel.	0.6
10/17/2008	Review Defendants' Protocol for tablet inspection. Prepare correspondence to plaintiffs' counsel re: MDL organization and working with Defendants to revise protocol. Multiple e-mails back and forth re: protocol and procedure.	1.6
10/20/2008	E-mail from Harry Bell setting up conference call. Review applications for PSC submitted to date; conference call with co-counsel re: status of applications. File Application.	2.4
10/22/2008	Conference call with co-counsel.	0.6
10/23/2008	Conference call with co-counsel.	0.6
10/24/2008	Travel to Charleston, WV. Meet with Angie Volk. Travel to Charleston, SC	10.2

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10/28/2008	Review D. Becnel's Objection to Appointment of Teresa Toriseva as Co-Lead; Multiple conference calls with co-counsel. Review proposal from John Newton with EMSL re: lab testing. Conference with C. Scott to discuss.	2.6
11/3/2008	Review latest filings from co-counsel and court; Supp. Support for T. Toriseva, new CTO's, etc. Conference call with co-counsel.	1.1
11/4/2008	Conference call with co-counsel. E-mails back and forth with H. Bell and T. Toriseva re: schedules and PSC organization.	1.6
11/5/2008	Review P'TO 4 from court. Conference call with co-counsel to discuss. E-mails with co-leads re: MDL vs. State Court consolidation. Draft letter to PSC.	2.4
11/6/2008	Conference call with co-counsel re: PSC and organization. Conference with C. Scott re: setting up meeting in WV for PSC organization; areas needing most attention, etc. Prepare correspondence to PSC. E-mails back and forth with co-counsel to narrow dow	3.1

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11/7/2008	Conference call with Vance Andrus to discuss PSC organization and to get ideas on efficiency. Meeting with atty. Carter to discuss implementation of these ideas. Review documents sent by V. Andrus as examples of other MDL org. documents, and conf. with Atty Carter.	4.2
11/10/2008	Conference call with C. Frankovitch re: PSC	1.1
11/11/2008	Digitek PSC Conference Call	1.00
11/12/2008	Conference calls and e-mails back and forth with co-leads concerning next meeting, assessments, operating account, etc.	1.60
11/16/2008	Prepare for status conference. Conference call with co-counsel.	4.80
11/16/2008	Prepare budget proposal.	5.10
11/18/2008	Travel to Charleston WV for status conference.	5.50
11/18/2008	Attend PSC meeting to discuss strategy. Meet with defendants in preparation for status conference tomorrow.	7.20
11/19/2008	Status Conference. Travel back to Charleston, SC	10.00
11/21/2008	Prepare for conference call with leads., create agenda, meet with atty. Carter to go over agenda, participate in conference call	2.20

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	Conference with M. Carter re: committee assignments. Review list of PSC members and prepare list of which areas need most support. Prepare correspondence to PSC to discuss committees and request volunteers.	
11/24/2008	Review PTO #6 just in.	3.70
11/25/2008	Travel to Charleston, WV. Meet with co-counsel.	5.70
11/26/2008	Prepare for and attend Status Conference. Travel back to Charleston, SC	10.20
12/1/2008	Conference call with Teresa Toriseva and Carl Frankovitch.	1.60
12/2/2008	Review PTO #7. Co-lead call.	1.70
12/4/2008	Co-Lead call re: protective order.	0.70
12/5/2008	Set up and participate in subcommittee conference calls (expert, law and pleadings, discovery, etc.)	2.70
12/9/2008	Review PTO Number 8.	0.70
12/16/2008	Telephone call from reporter re: PSC committee. Conference with C. Frankovitch and reporter. Conference with opposing counsel.	1.70
12/17/2008	Conference call with co-lead and with defense counsel. E-mails back and forth from Harry Bell re: IT issues. E-mail from Angie Volk re: funds issue. Conference with co-lead to try to iron out problems.	3.70

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12/18/2008	Multiple calls back and forth with Carl Frankovitch and Harry Bell re: account set up. Participate in Law and pleading committee, discovery committee, and expert committee conference calls.	4.20
12/19/2008	Conference call with atty. Frankovitch re: funds issue. Review paperwork.	2.20
12/22/2008	Conference with atty. Carter to discuss IT issues. Prepare e-mail re: IT issues.	0.80
12/23/2008	Continue working on draft of master complaint. Conference call with Carl Frankovitch.	2.20
12/31/2008	Finalize draft of Report re: PTO 7. File.	2.50
1/5/2009	Review PTO # 9. Conference with atty. Carter re: latest correspondence	0.90
1/6/2009	Review e-mail from Angie Volk from Judge Goodwin's office re: severance report and briefing re: direct filing. Conference with atty. Carter and continue draft of briefing re: direct filing, time and expense issues, etc.	7.00
1/7/2009	Conference call from T. Toriseva and C. Frankovitch re: testing protocols. Conference call with Balt rep.	2.20
1/8/2009	Review preservation order and protection order as well as proposed lab protocol and proposal from lab for pill testing. Conference with atty. Carter.	2.60

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1/9/2009	Prepare for conference call. Conference call with co-counsel. Further review of PTO #9 to make to-do list of what needs to be discussed with PSC. Draft letter setting out guidelines for common work. E-mails back and forth with Defense re: setting up meeting. Conference with M. Carter to set up.	3.50
1/13/2009	Conference call with co-leads to discuss meeting to be scheduled in OH. Prepare correspondence to send to co-counsel re: protective order. Finalize proposed preservation order and search criteria list.	4.90
1/14/2009	Review documents provided by WesBanco for the common fund. Multiple conference calls with Carl Frankovitch and Harry Bell. meetings with M. Carter to get list and schedule. Work on severance issues with M. Carter and C. Scott.	3.50
1/16/2009	Meeting with M. Carter to discuss guidelines of what needs to be discussed with PSC. Prepare correspondence to PSC re: protective order, master complaint, status of litigation. E-mail from Michael Anderton; various e-mails back and forth with co-leads; Draft letter to PSC; detail time and assessment process, etc.	6.20

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1/20/2009	Review Master Complaint and Preservation orders. Conference with atty. Carter. Emails from Plaintiffs' counsel with filing questions. Emails to and from Plaintiffs' counsel and M. Carter re: tolling agreement, Master Complaint, etc. Research Master Complaint issues.	5.20
1/21/2009	Travel to Washington, DC. Prepare for meeting.	9.20
1/22/2009	Attend meeting. Travel back to Charleston, SC	8.20
1/23/2009	Co-lead conference call re: Washington, DC meeting. E-mails from Defendants re: items to add to Preservation order.	1.90
1/26/2009	Travel to Charleston, WV for status conference. Connecting flight delayed. E-mails and calls back and forth to co-counsel to discuss status during absence. E-mails back and forth with M. Carter re: setting up PSC calls and a meeting.	5.50
1/29/2009	Review PTO 10. Instructions to staff to calendar. Review revised proposed preservation order. E-mails back and forth with M. Carter.	1.40
1/30/2009	Prepare for and participate in PSC conference call.	2.50
2/3/2009	Conference with atty. Carter in preparation for conference call. Conference call with co-counsel re: preservation order. Review PTO 11.	3.70

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2/4/2009	Additional calls and drafts of Proposed Preservation Order and Master Complaint.	2.10
2/5/2009	Review PTO 12. Continue drafting and editing Master Complaint.	2.80
2/6/2009	Conference calls with defense counsel and with co-leads; review and discuss master complaint and latest PTO from court.	2.70
2/9/2009	Conference call with co-leads; conference call with defendants re: outstanding briefing relating to master complaint, scheduling order, etc. Final draft of Master Complaint and Preservation Order; File.	7.20
2/12/2009	Conference call with co-leads re: CMO. Conference call with defense counsel re: scheduling order. Review correspondence from defense counsel to court. Various e-mails back and forth with co-leads and M. Carter re: response.	3.50
2/15/2009	E-mail from Matt Moriarty re: scheduling call. E-mails to and from M. Carter.	0.20
2/16/2009	Prepare for call. Conference call with co-leads and defense counsel re: discovery and CMOs.	1.80
2/17/2009	Review PTO 14. Review e-mails back and forth between co-leads re: latest PTO. Email from Matt Moriarty scheduling call. Multiple e-mails trying to schedule.	2.10

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2/18/2009	Conference call with co-leads. Review correspondence from Matt Moriarty and proposed CMO.	2.10
2/19/2009	Review draft Plaintiffs' Fact Sheet. Conference call with PSC.	1.60
2/20/2009	Call with co-leads; call with defense counsel. Review Application for PSC from James Pettit. Review e-mails from Shelly Sanford re: lab testing. Conference with M. Carter to discuss lab information and distribution.	3.40
2/23/2009	Review Case Management Order and Scheduling Order from court.	0.50
2/25/2009	Review Change of Counsel form for Paul Sizemore to O'Callahan. Conference with Staff to change mailing list.	0.40
2/27/2009	Email M. Carter re: PSC meeting details. Review and compare options, especially costs.	2.30
3/1/2009	Edit Grid; Conference with M. Carter re: changes.	2.10
3/2/2009	Prepare e-mail to PSC re: grid. Transmit grid.	0.40
3/3/2009	Review PFS forms filed by R. Betts. Conference with M. Carter re: changes.	1.20
3/4/2009	Review PTO 15 re: status conference time change. Forward to staff to calendar.	0.40

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3/4/2009	Travel to Charleston, WV for status conference. Prepare for status conference.	7.80
3/5/2009	Meet with co-leads and prepare for status conference. Attend status conference. Travel back to SC. Review PTO 16 setting CMO and Scheduling Order. Conference with M. Carter and staff.	9.50
3/6/2009	Prepare agenda for PSC meeting; discuss with M. Carter.	2.80
3/8/2009	Edit agenda for PSC meeting.	1.00
3/9/2009	Travel to Houston for PSC meeting. Meet with co-leads. Review PTO 17 setting deadlines. Conference with staff re: scheduling and calendaring.	7.20
3/10/2009	PSC meeting; travel back to SC	9.00
3/11/2009	Review PTO 17.	0.40
3/12/2009	Review PFS and non-digitek preservation order. Conference call with defense counsel and meeting with M. Carter.	1.70
3/13/2009	Multiple e-mails back and forth with co-leads re: preservation order and discovery.	0.80
3/17/2009	Conference with M. Carter and conference calls with Defense counsel.	1.90
3/18/2009	Conferences with co-lead; defense counsel, etc. re: conduct of discovery and preservation order. Meeting with M. Carter.	2.1

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3/19/2009	Continue working on preservation order and conduct of discovery drafts. Meeting with M. Carter; conferences with co-leads.	4.5
3/20/2009	Revire proposed direct filing order; PTO 18; compare with PTO 13. conference with C. Frankovitch re: protective order. Meeting with M. Carter.	3.2
3/23/2009	Review defendants' correspondence re: philadelphia state case; Conference call with co-leads.	2.4
3/25/2009	Review PTO 19. Conference with M. Carter re: direct filing and making sure to inform PSC.	1.3
3/26/2009	Conference call with M. Carter and C. Frankovitch re: orders and proposed orders; CMO issues, etc.	1.1
3/27/2009	Meeting with M. Carter re: FOIA request.	1.3
3/31/2009	Prepare for call. Discovery committee conference call.	1.9
4/7/2009	Discovery platform chart	0.6
4/7/2009	Conference with Meghan Carter re Discovery vendor and interrogatories	0.5
4/7/2009	Continue working on RFP & Rogs with Meghan Carter.	1.5
4/8/2009	Conference with Meghan Carter re-discovery	0.3
4/8/2009	Conference with Meghan Johnson and Marissa Bessis concerning RFP & Rogs	0.4

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4/9/2009	Conference with Meghan Johnson and Marissa Bessis re discovery, documents, and organizational depositions; Document review; Conference call with Rich Hood re: discovery vendors.	5.2
4/10/2009	Conference with M. Carter re: Digitek to-do list. Conference with M. Anderton re: Electronic Discovery. Conference with M. McDonough re: Tolling Agreement. Work on Electronic disc. Agreement.	2.8
4/13/2009	Conference with atty. Carter re Digitek to do list and calls to be made. Prepare for and attend co-lead call. Conference with atty. Carter re: document review platforms, and the protective order.	2.2
4/14/2009	Conference with atty. Carter re: Inventus & Crivella West. Prepare for conference call with Dr. Nelson.	1.5
4/15/2009	Conference with Carl Frankovitch re Digitek meeting times, documents etc. Conference with M. Carter re: 30(b)(6) representative discovery.	1.5
4/16/2009	Conference with M. Carter re today's meeting and discovery vendors. Meeting with atty. Meghan Johnson and with Marissa Bessis re: 30(b)(6) format & areas, try to call Pete Miller, Follow up w/ Rick Meadows and look over Crivella West Proposal. Meeting wi	1.8

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4/17/2009	Meeting with atty. Meghan Johnson re: 30 (b)(6). Conference call with M. Johnson and C. Frankovitch.	0.6
4/20/2009	Conference with Meghan Carter re: to do list. Review correspondence to co-leads from M. Carter. Review Answer to Master Complaint and Master Complaint Adopted by Individuals. Review Motion to Dismiss counts 1,2, and 3. Review Motion to Dismiss Count 5. Review Motion to Dismiss Count 18. Conference with M. Carter re: research..	3.4
4/21/2009	Review e-mails back and forth from defense counsel. Conference with atty. Carter re: action items; conference call with Carl Frankovitch. Conference with Matt Moriarty re: tolling agreement. Meeting with M. Carter in preparation for co-lead call. Co-Lead call.	3.8
4/22/2009	Review Tolling Chart.; Conference with M. Carter re Spreadsheet and sending out. Conference call with M. Carter re: cases filed in LA. Research in response to Motions to Dismiss.	2.1
4/23/2009	Review correspondence and updated spreadsheet from M. Carter. Conference with M. Carter re:tolling. Conference with Defendants re: tolling agreement. Review multiple e-mails back and forth re: tolling.	1.2

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4/27/2009	Conference with atty. Carter re: agenda for call. Preparations for call. Participate in Co-lead call w/ Defendants. Prepare for PSC call. Participate and lead PSC call. Preparation for status conference.	5.8
4/28/2009	Meet with co-leads and prepare for status conference	3.8
4/28/2009	Travel to W.VA. for status conference. Prepare for status conference.	7.8
4/29/2009	Status Conference	1.6
4/29/2009	Travel from W.Va to SC	7
4/30/2009	Conference with atty. Carter re: new PSC members, call today and email from listserv	0.6
4/30/2009	Call w/ Law & Pleading Committee; call with PSC	1
4/30/2009	Call w/ Defendants. Conference with atty. Carter re: call.	1.2
5/1/2009	Review Email from atty. Carter re:status conf. date. Reivew subpoena and company information from M. Carter; Conference with atty. Carter re: deposition dates, time needed for depositions, dates for Oct. Status Conference, document repository and subpoenas.	1.9
5/4/2009	Review e-mail from atty. Carter. Review PTO 21 just in. Forward to staff with instructions to schedule.	0.8
5/5/2009	Conference with atty. Carter re: to do list.	0.8

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5/6/2009	Review e-mail from M. Moriarty. Conference with atty. Carter re: schedule. Prepare letter to send to list-serve. Conference with atty. Carter re: Crivella West and to-do list. Review Application for John O'Quinn to join PSC. E-mail from Michael Anderton. Emails back and forth to M. Carter re: response.	3.2
5/7/2009	Review e-mail from atty. Carter re conduct of discovery; Prepare e-mail re: conduct of discovery. Review e-mail from M. Carter re: Crivella West Training. COnference call with C. Frankovitch.	1.9
5/8/2009	Conference with atty Carter re: deposition scheduling	0.4
5/8/2009	Conference with atty. Carter re: getting list of assessments paid.	0.4
5/8/2009	Prepare for and attend Law & Pleading Call	1.1
5/11/2009	Conference with atty. Carter on preparing agenda for PSC call.. Prepare for PSC Call. PSC call. Review Application from M. Lanier for PSC.	2.4
5/12/2009	Email's back and forth with co-leads re PFS & extensions	0.6
5/12/2009		0.6

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	Prepare for call. Review email from atty. Carter re: Don Ernst, coding information, depositions, etc. Review e-mails back and forth from Matt Moriarty. Emailing out to all counsel listserv instructions for serving PFS and responding to various emails re MDL issues. Review interrogatory, RTP responses from UDL and Mylan.	
5/12/2009	Review objections from UDL and Mylan.	5.2
5/13/2009	Review message from atty. Carter re Digitek	0.2
5/13/2009	Prepare response to Defendants re: upcoming meeting	0.4
5/13/2009	Review w-mail from atty. Carter re: Serving Plaintiffs Fact Sheet	0.5
5/13/2009	Conference with atty. Carter re: MDL Issues	0.8
5/14/2009	Prepare for call. Co-lead call.	1.2
5/15/2009	Call w/ Defendants; Get ready for todays calls, Conference with atty. Carter and atty. Frankovitch. Co-lead call; prepare for call; law pleading call. Review deposition cross notices and latest PSC applications. Review latest correspondnence from Defendants and e-mails from PSC.	5.3
5/17/2009	Prepare for upcoming depositions. Emails to M. Carter re: additional materials needed.	7.3
5/18/2009	Call with Defendants	0.5

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5/18/2009	Prepare for upcoming depositions. Review documents.	4.9
5/18/2009	Conference with atty. Carter re: Deposition Documents & Deposition. Finalize response to motion to dismiss counts in complaint. Review Digitek PSC e-mails re: response to Motion to Dismiss, items to be addressed.	4.5
5/19/2009	Travel to NYC. Prepare for deposition. Review PTO 22 re: conditional discovery. File response to Motion to Dismiss counts 1, 2, and 3. File response to motion to dismiss count 18. File response to motion to dismiss count 18.	9
5/20/2009	Prepare for Deposition; Deposition	10
5/21/2009	Prepare for Deposition: Deposition; Travel back to Charleston	14
5/22/2009	Conference with atty. Carter re: court reporter and depositions. Review discovery responses from Actavis.	2.8
5/25/2009	Deposition preparation for quality assurance representative. E-mails back and forth with M. Carter re: items needed.	5.2

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5/26/2009	Deposition Preparation; conference with atty. Carter re: deposition and travel. Review application for Shamus Mulderig for PSC. Review e-mail from T. Toriseva re: letter to Goodwin. Discuss with M. Carter.	7.8
5/27/2009	Call w/ Defendants; deposition preparation. Travel	8.3
5/28/2009	Prepare for deposition; attend deposition	6.8
5/29/2009	Travel back to Charleston, SC. Review PTO 23 re: PSC modification.	5.8
6/1/2009	Conference with atty. Carter.	0.9
6/2/2009	Conference with C. Frankovitch.	0.4
6/2/2009	Conference with atty. Carter re: preparations for Houston meeting; guidelines, agenda, etc.	1.4
6/2/2009	Conference with atty. Carter re: subpoenas. Edit and finalize briefing to reply to Mylan x3. File.	4.8
6/3/2009	Prepare for calls today. Finish draft of agenda. Call w/ Co-lead & Defendants; call with just co-lead; conference with M. Carter re: Crivella West. Review Westin contract, conference with M. Carter re: houston meeting and research project. Review correspondence from M. Moriarty re: motion to quash.	5.2

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6/4/2009	Review Motion to Quash and latest correspondence with Defendants. Review draft of letter from M. Carter. Conference with co-leads to discuss. Review Order granting stay. Begin drafting response. Review latest correspondence from Defendants.	4.5
6/5/2009	Drafting and editing response to Motion to Quash with M. Carter.	1.2
6/5/2009	Prepare for Call; co-lead call. Continue Motion to Quash review and edits.	2.2
6/9/2009	Prepare for PSC Meeting; Finalize response to Motion to Quash. Conference with M. Carter re: to file under seal.	5.3
6/10/2009	Travel to Houston; Dinner meeting with PSC. E-mail from M. Moriarty re: agenda. Work on Agenda items.	7.3
6/11/2009	Travel back to Charleston, SC	3.5
6/11/2009	PSC Meeting. Review Notice of Deposition of Jarrell; forward to staff to calendar.	8.5
6/12/2009	Conference with atty. Carter re: deadlines & to-do list, Co-lead call with C. Frankovitch.	3
6/12/2009	Prepare for call. Call w/ Defendants. Motion to Expand Scope of Discovery.	4

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6/15/2009	Review Defendants' Response to Opposition re: Motion to Quash. Conference with M. Carter re: whether to respond further.	1.2
6/16/2009	Travel to Charleston, WV. Meeting with co-counsel. Dinner meeting with atty Frankovitch and atty. Carter. Prepare for status conference.	9.5
6/17/2009	Prepare for hearing; Plaintiffs Meeting w/ Judge. Status conference. Travel back to SC. Review PTO 24 and forward to staff for calendaring.	11
6/18/2009	Call w/ New Jersey co-counsel; Prepare for call; Science and expert call. Review PTO 25 scheduling trial pool. Forward to staff for calendaring.	2.8
6/19/2009	Conference with atty. Carter re Ervin complaint. Review PTO 26 denying Motion to seal and filing Motion to Quash.	0.8
6/22/2009	Conference with M. Carter re deposition date. Review PTO #26 and new deposition notices. Review Defendants' brief in opposition to our response to Motion to Quash. Conference with M. Carter; outlining what is needed in response.	4.2
6/23/2009	Meeting with M. Carter re letter from Defendants.	0.9
6/23/2009	Conference with M. Carter re: update to listserv w/ Status Conf. minutes.	1

6/24/2009	Conference with M. Carter re: review of documents. Continue editing. Prepare list of documents still needed for reply. Correspondence back and forth to M. Carter.	1.9
6/26/2009	Conference with M. Carter and draft and edit Reply to Def. Response to Motion to Quash.	3.4
6/29/2009	Trial Selection Meeting Planning with M. Carter. Conference with J. Kohn to reserve space; conference with staff re: booking travel arrangements, etc.	2.1
6/30/2009	Conference with M. Carter. Review notice of cancellation of deposition of Jarrell. Review e-mail from Angie Volk re: briefing time. Conference with Plaintiffs' counsel. Prepare e-mail to Angie Volk re: no extension needed.	1.5
7/1/2009	Conference with M. Carter, D. Wilharn, and C. Frankovitch re Orders	1
7/1/2009	Review latest deposition notices. Conference with M. Carter to discuss scheduling. Review PTO 27 Granting Plaintiffs' Motions re: scope of discovery. Review PTO 28 denying Defendants' Motion to Quash.	4.2

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7/2/2009	Review Conduct of Discovery Order. Conference with M. Carter and C. Frankovitch re orders etc. Conference with M. Carter re: RFAs. Review PTO 29 re: severance procedures. Prepare e-mail to M. Moriarty requesting extension. Review e-mail denying same. Conference with co-counsel to advise.	3.2
7/4/2009	Conference with M. Carter re: ex parte contact motion.	0.8
7/5/2009	Master Objections to RTA.	3.2
7/6/2009	Finalize Motion for Exp Parte Contact. File. Finalize objections to RTAs. File Master Objections to Defendants' Requests to Admit and Brief in Support.	4.8
7/8/2009	Meeting w with M. Carter	0.7
7/8/2009	Review email from M. Carter re: trial selection.	0.8
7/9/2009	Work on MDL to-do list, talk to Carl re Digitek Trial Selection	0.5
7/10/2009	Conference with M. Carter re pill testing.	0.9
7/10/2009	Digitek emails, figure out who's coming to trial selection committee, send out emails, Review memorandum in opposition to plaintiffs' ex parte motion.	4.2
7/13/2009	Memo in Opposition to Ex Parte Contact Motion.	1.2

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7/14/2009	Travel to Philadelphia for trial selection meeting. Work on trial selection. Review latest motion from Defendants re: discovery. Review 30(a)(6) Motion in response to objections to RTAs. Finalize and file Reply to Memo in Opposition to Ex Parte Contact Motion. E-mails from M. Carter re: responses due today.	11
7/15/2009	Trial Selection Meeting; travel back to Charleston.	10
7/16/2009	Conference with M. Carter. Draft correspondence to court. transmit. Conference with M. Carter and C. Frankovitch re: PTO 16.	1.8
7/20/2009	Call w/ Pltfs Counsel re: defense trial pick. Review discovery from Defendants. Forward to M. Carter.	1.8
7/21/2009	Call w/ Plaintiffs attorneys. Review trial case summaries.	1.5
7/21/2009	Travel to West Virginia. Prepare for hearing.	7.2
7/22/2009	Meeting with M. Carter & C. Frankovitch and prepare for hearing; attend hearing; travel back to SC	9
7/23/2009	Prepare for afternoon calls. Conference with M. Carter; review draft of letter to court; edit. Prepare e-mail to M. Carter re: to do list.	3.2
7/27/2009	Review PTO 32. Review and respond to Digitek e-mails.	1.4

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7/28/2009	Conference with M. Carter re Digitek MDL repository and PTO # 32	0.5
7/29/2009	Multiple e-mails back and forth re: discovery issues.	1.5
7/30/2009	Meeting with M. Carter re: production of medical records, amendments to PTO # 16, Defendants objections to PTO # 27. E-filing response in opposition to Defendants motion re our objections. Meeting with M. Carter re: e-mail to plaintiff's counsel. Conference with P. Andrews re: travel. E-mail to Angie Volk and counsel re: time change.	4.2
7/31/2009	E-mails to and from Defendants re: discovery and PTO 16. Meeting with M. Carter r: PTO 16, about objections, trial cases, etc. Conference with Plaintiffs; counsel.	2.8
8/3/2009	Conference with C. Frankovitch and M. Carter re meeting & cases. Review PTO # 33.	0.6
8/4/2009	Call with Matt Moriarty. E-mails back and forth to co-lead.	1.5
8/4/2009	Conference call with M. Carter; E-mails back and forth with parties re: depositions.	2.8
8/5/2009	Review PTO 35 re: trial groups, Pto 36 re: setting oral argument. Forward to staff for calendaring. Review Defendants' Motion re: medical and pharmacy records.	1.3

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8/6/2009	Prepare for calls. Calls with co-leads and trial pick counsel. E-mail from plaintiff's counsel re: documents needed. Conference with M. Carter re: response and also status of calendar/website.	3.2
8/7/2009	Prepare for call. Trial counsel call, emails back and forth re: trial set cases and scheduling; depositions. etc; Review PTO 36. Review proposed agenda and latest motion from Defendants. Finalize and file reply to 30(a)(6) motion	6.2
8/10/2009	Prepare for status conference and hearing. Travel to West Virginia. Review PTO 37.	9
8/11/2009	Prepare for status conf. and hearing; status conference and hearing; travel back to Charleston SC	11
8/12/2009	Review e-mails from PSC. Conference with M. Carter re: response needed.	1.1
8/13/2009	Review PTO 38 re: scheduling order. Forward to staff for calendaring. Conference with M. Carter re: upcoming deadlines.	1.1
8/18/2009	Review and edit letter from M. Carter to MDL; multiple e-mails back and forth from co-counsel.	1.2
8/18/2009	Conference with M.Carter re: letter from Defendants. Conference re: deposition sharing. Conference call with M. Carter and Matt Moriarty. Conference call with Defendants.	1.5

Digitek MDL

8/19/2009	Review FOIA documents and conference with M. Carter.	1.1
8/21/2009	Conference with M. Carter re: deadlines.	0.3
8/26/2009	Review PTO 39.	0.2
8/29/2009	Review Actavis discovery responses. Review UDL objections and discovery responses. Conference with atty. Carter re: additional discovery.	1.2
8/31/2009	Review correspondence from C. Frankovitch.	0.2
9/2/2009	E-mail from M. Carter re: call. Research re: expert; conference with M. Carter to do additional research; review and edit to-do list with M. Carter. Correspondence from M. Moriarty. Conference with Plaintiffs' counsel.	2.1
9/3/2009	Prepare for co-lead call; Call w/ co-leads & Shamus; co-lead call; Call with trial cases; PSC call. E-mails back and forth with Plaintiffs' counsel re: deponents names and scheduling depositions without further documentation.	4.3
9/4/2009	Conference with M. Carter re trial cases. Email from Moriarty re: screening process. E-mails to and from M. Carter discussing. Review Notice of Deposition.	1.8
9/9/2009	Review PTO # 39; Conference with M. Carter re: objections- draft list for her to begin work.	1.6

Fred Thompson, Motley Rice LLC

Digitek MDL

9/10/2009	Review draft of objections and edit; filing. Review lone pine motion. Meeting with M. Carter to discuss response. E-mails back and forth re: lone pine. Finalize objection to PTO 39. File.	5.8
9/14/2009	Review latest briefing from Defendants. Conference with M. Carter re: strategy and to-do list. Review motion for leave to file response to Plaintiff's objection ot PTO 39.	3.4
9/15/2009	Review latest lone pine briefing. Meeting with M. Carter to discuss latest briefing. Review supplemental lone pine.	1.8
9/18/2009	Review latest briefing from Defendants. Review PTO 40. E-mail from M. Moriarty re: production, etc. Gathering list together for specific task items which need to be addressed.	2.3
9/21/2009	Conference with M. Carter re: Digitek letter / meet& confer letter. Review, edit letter.	1.2
9/22/2009	Review draft of PTO # 27 letter; edit.	1
9/23/2009	Review outline of lone pine response; edits and further drafting. Conference with M. Carter re: motions.	3.2

Digitek MDL

9/24/2009	Review PTO 41 and multiple motions from Defendant. Conference with M. Carter setting out points of contention and draft of response. Finalize Lone Pine response, Motion for Extension, and Motion to Compel. File.	4.5
9/25/2009	Conference with M. Carter re Motion to Compel etc	0.4
9/25/2009	Digitek M DL Crivella West Trainig	0.8
9/28/2009	Conference with M. Carter re Letter	0.5
9/28/2009	Review correspondence from defendants re: pill testing.	0.6
9/29/2009	Review PTO 42. Review discovery requests for Luce trial case. Conference with C. Scott to discuss draft of responses and issues.	1.5
10/1/2009	Review correspondence from Defendants re: PTO 16. Prepare for call. Call w/ Defendants; co-lead call. Draft letter to PSC. Send to M. Carter for edits. Conference with M. Carter. E-mails to PSC re: discovery deadlines.	4.8
10/6/2009	Review latest lone pine briefing. Meeting with M. Carter to discuss.	1.8
10/7/2009	Conference with M. Carter re to-do list. Review and respond to Digitek e-mails. Draft letter re: PTO 44. Review letter, edit, and approve for submission.	2.9

Fred Thompson, Motley Rice LLC

Digitek MDL

10/8/2009	Review letter drafted by M. Carter; edit. Review briefing re: extension of deadlines. Review Defendants' Response to Motion to Compel.	1.8
10/10/2009	Preparation for upcoming depositions; review documents and exhibits.	4.8
10/12/2009	Prepare for Call, Call w/ Trial Counsel	1.4
10/16/2009	Conference call with co-leads. Review e-mail from A. Volk extending deadlines.	0.7
10/17/2009	Prepare for depositions.	7
10/18/2009	Travel to NYC	6.5
10/19/2009	Prepare for depositions.	3
10/19/2009	Prepare for PSC Meeting, PSC Meeting, deposition preparation.	10
10/20/2009	Deposition, prepare for tomorrow's deposition. Reply to response in opposition.	13.5
10/21/2009	Eamonn Murphy Deposition; prepare for tomorrow's depositions	11
10/22/2009	Prepare for depositions. Depositions of Mark Toole & Rich Mayo	10.5
10/23/2009	Deposition preparations for Bakul; Deposition; travel back to Charleston. Review PTO number 46 denying Motion to Compel.	9.5
10/25/2009	Conference with M. Carter re: upcoming depositions.	0.5
10/29/2009	Review correspondence from M. Carter	0.2

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Digitek MDL

10/30/2009	Conference with M. Carter re: her call with C. Frankovitch; action items.	0.4
11/3/2009	Staff meeting re: research needed.	1
11/5/2009	Meeting with M. Carter re: letter.	0.8
11/6/2009	Meeting with M. Carter re: correspondence from Defendants.	0.8
11/9/2009	Correspondence from M. Carter.	0.2
11/10/2009	Correspondence from M. Carter.	0.2
11/11/2009	Prepare for Call w/ co leads; call with Defendants; Conference with M. Carter;	1.8
11/12/2009	Conference with M. Carter; Prepare for conference call. Conference call with co-lead counsel and defense. Review PTO 46 just in.	2.8
11/13/2009	Review trial case information from defendants.	1.9
11/16/2009	Conference with M. Carter re experts.	0.4
11/17/2009	Conference with M. Carter re: trial summary letter. Edit letter.	1.6
11/18/2009	Prepare for calls with experts. Call w/ Dr. Butterly; call with Dr. Nelson;	3.2
11/19/2009	Travel to West Virginia; prepare for status conference	9.5
11/20/2009	Prepare for hearing; trial counsel meeting; attend hearing; travel back to SC.	10.3

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Digitek MDL

11/23/2009	Conference with M. Carter re: status conference and December depositions	0.5
11/23/2009	Read letter from defendants and forward to M. Carter. File Notice of Deposition x 3.	1.3
11/24/2009	Prepare for call; conference with M. Carter; Call w/ Trial Counsel & Deposition Group; post-call conference with M. Carter re: items to follow up. Review PT0 47 re: status conference. Forward to staff to calendar.	3.2
11/25/2009	Conference with Plaintiff's counsel.	0.8
11/30/2009	Conference with Co-leads re: depositions and schedules.	1.2
12/2/2009	Review letter drafted by M. Carter; edit. Conference re: changes and further information to be added.	1.6
12/2/2009	Prepare for call; Call w/ trial counsel re: depositions. Conference with M. Carter re: MDL expenses and action list; 30b6 deposition notices and subpoenas. Review correspondence from H. Bell.	4.2
12/4/2009	Conference with M. Carter re: responses to MDL emails.	0.4
12/7/2009	Conference with M. Carter re: teleconference with C. Frankovitch. Review and respond to Digitek e-mails.	0.8
12/8/2009	Prepare for depositions.	5.2
12/9/2009	Prepare for depositions and review documents.	7

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Digitek MDL

12/11/2009	Prepare for depositions	5.4
12/13/2009	Prepare for Depositions; Conference with M. Carter. Travel to NY. Approve and file deposition notices for 30b6 witnesses.	11
12/14/2009	Prepare for deposition. Deposition of Terri Nataline. Working dinner with P. Miller and M. Carter	14
12/15/2009	Depo prep, breakfast with M. Carter; meeting with Sofia Bruera, M. Carter, Pete Miller, Pete and Shelly Sanford before deposition. Swapan Roychowdhury deposition. Prepare for Rick Dowling deposition.	15
12/16/2009	Prep for Rick Dowling deposition. Deposition of Rick Dowling. Dinner with M. Carter and Shelly Sanford.	14
12/18/2009	Review PTO 48 rescheduling Science day; Forward to staff to schedule. Conference with M. Carter re: getting experts situated.	1.3
12/21/2009	Review correspondence from defense counsel.	0.2
12/22/2009	call w/ Defendants re self critical analysis privilege	0.4
12/28/2009	Motion to compel	2.8

Fred Thompson. Motley Rice LLC

Digitek MDL

12/29/2009	Prepare for meet and confer with Defendants. Meet & Confer w/ Defendants, Conference with M. Carter re call and to do list. Conference call with defendants concerning experts; conference call re depositions; Meeting with atty. Carter to discuss deadlines. Finalize Motion to Compel. File.	4.5
12/30/2009	Conference with atty. Carter re: GMP audit.	1.00
12/30/2009	Conference call with Expert Committee	1.00
1/4/2010	Conference with Plaintiff and Defendant co-leads. Finalize, approve, and file Notices of Deposition for Zhu, Eng, and C. Patel.	1.8
1/6/2010	Conference with M. Carter re: D. Patel deposition; review action list re: science committee. Document review.	4.5
1/7/2010	Draft letter to judge re scheduling order deadlines. Conference with M. Carter re: edits. Conference M. Thornton and M. Carter re: research assignment.	3.2
1/8/2010	Review PTO 49 re: lone pine order. Call with Plaintiffs' counsel.	1.2
1/11/2010	Prepare for PSC meeting.	2
1/12/2010	Review latest briefing from Defendants re: Motion to Compel.	0.3
1/15/2010	Conference with M. Carter re: minutes. Prepare for deposition.	4.2

Fred Thompson, Motley Rice LLC

Digitek MDL

1/16/2010	Prepare for depositions, Conference with M. Carter re: correspondence to send out.	5.8
1/17/2010	Prep for depositions and review documents.	4.8
1/19/2010	Prep for depositions and review documents. Finalize and file Plaintiffs' Reply to Defendant's response to Motion to Compel.	6.8
1/20/2010	Prepare for depositions	5.5
1/21/2010	E-mails with co-leads re: proposed common benefit order.	0.7
1/23/2010	Deposition preparation and document review.	4.3
1/24/2010	Deposition preparations	5.2
1/25/2010	Prepare for Bitler & Zhu Depositions	7
1/26/2010	Deposition preparation. Conference with M. Carter re: additional documents needed. Travel to NY	13
1/27/2010	Conference with M. Carter re: deposition.; Depo prep; deposition of Jisheng Zhu. Prepare for tomorrow's deposition.	14
1/28/2010	Deposition preparation; Deposition of Wanda Eng. Travel back to Charleston.	12.3
1/29/2010	Oluffson Depo prep	5.2
1/30/2010	Oluffson Depo prep	6.2
2/2/2010	Meeting with M. Carter to discuss depositions.	1.3
2/2/2010	Prepare for call; Call with Defendants	1.3

Fred Thompson. Motley Rice LLC

Digitek MDL

2/5/2010	Prepare for Oluffson deposition. Approve and file Amended Notice of Deposition.	6.7
2/6/2010	Prepare for Oluffson deposition.	5.2
2/7/2010	Conference with M. Carter, Sandy Summers, & Carmen Scott re MDL trial cases.	2.5
2/7/2010	Prepare for depositions	6.5
2/8/2010	Review attorney appearance and Motion for Protective Order for Jasmine Shah. Prepare for depositions; review documents.	5.8
2/9/2010	Travel to New York. Deposition preparation. Review PTO 51 temporarily giving protection to J. Shah.	9
2/10/2010	Deposition Preparation.	8.5
2/11/2010	Prepare for status conference. Status conference.	8.6
2/12/2010	Depo prep and depo. Travel back to SC.	12.5
2/19/2010	Motion to compel.	2.1
2/22/2010	Conference with M. Carter re: upcoming depositions and motions. Call from expert. E-mails back and forth with M. Carter re: experts on board.	3.2
2/25/2010	Approve and file Notices of Deposition. Review PTO 54.	1
3/1/2010	Staff meeting re: MDL cases. Prepare for call. Co-lead call.	1.8
3/1/2010	Coordination with M. Carter re: dates.	1.2

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Digitek MDL

3/3/2010	Review proposed agenda to court. Edit; finalize. Conference with M. Carter.	2.1
3/4/2010	Conference with M. Carter re to do list in MDL, PSC meeting etc	0.9
3/5/2010	Call w/ Defendants; Meeting with M. Carter; Conference call with C. Frankovitch and M. Carter. Prepare PSC Agenda and send to M. Carter.	2.8
3/8/2010	Go over PSC agenda with M. Carter	0.5
3/9/2010	Assessment order, agenda, PSC meeting planning with M. Carter.	7.8
3/10/2010	Prepare for PSC meeting. PSC dinner.	7.5
3/13/2010	E-mails back and forth from M. Carter reL outstanding issues.	0.4
3/15/2010	Travel to Charleston, WV for meeting. Prepare for meeting.	8.5
3/16/2010	Attend meeting. Travel to NYC. PSC Meeting; meeting with M. Carter, C. Frankovitch, and P. Miller.	13
3/17/2010	Travel to NYC; prepare for depositions	12.5
3/18/2010	Breakfast meeting with M. Carter to prepare for depositions. Deposition; working dinner with P. Miller and M. Carter.	10
3/19/2010	Breakfast with P. Miller and M. Carter to prep for deposition. Travel home.	4.5

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Digitek MDL

3/24/2010	Conference with C. Scott, M. Carter, and C. Frankovitch.	1.5
3/25/2010	Prepare for call, call	4
3/26/2010	Prepare for deposition. Attend Depo - Jasmine Shah	6.2
3/26/2010	Travel	6
3/28/2010	Prepare for depositions.	7.2
3/29/2010	Travel to New York; prepare for depositions; meet with co-counsel	10.5
3/30/2010	Depositions; Travel. Dinner meeting with P. Miller.	12.8
3/31/2010	Preparation for deposition. Deposition of Nigalaye; travel home.	12
4/6/2010	Conference with M. Carter. Conference with C. Frankovitch and M. Carter.	1.4
4/8/2010	Call with Experts	1.3
4/11/2010	Prep for call w. Trial Counsel, Call w/ Trial Counsel, conference with M. Carter. Review PTO 57. Catch up on Digitek e-mails. Prepare for status conference.	7.00
4/12/2010	Travel to Charleston, WV for status conference. Meeting with co-leads.	9
4/13/2010	Travel to Charleston, WV. Working dinner with M. Carter to discuss hearing. Prepare for hearing. Attend status conference. Travel back to Charleston, SC	14.00

Fred Thompson, Motley Rice LLC

Digitek MDL

4/27/2010	Conference with M. Carter re: tolling agreement. Prepare for deposition.	7
4/29/2010	Travel to NYC. Prepare for deposition. Meet with M. Carter.	12
4/30/2010	Prep and Divya Patel's deposition. Travel back to SC	14
5/5/2010	Travel to OH. Prepare for meeting.	12.00
5/6/2010	Preparation for deposition. Deposition of Rick Dowling. Travel back from deposition	14.3
5/6/2010	Travel to Cleveland to meet with Matt Moriarty. Attend meeting, discussions on case resolution, criteria, etc. Travel to New York City. Deposition preparations.	15.00
5/7/2010	Staff meeting re: to do list for Digitek MDL. Emails back and forth from M. Carter re: Expert committee calls needed	1.30
5/10/2010	Emails and meet with Meghan Carter and Carmen Scott re experts; review settlement grid; conference with co-lead.	5
5/21/2010	Conference with Carl Frankovitch re: settlement discussions, meeting with Judge Goodwin, Etc.	1.00
5/24/2010	E-mails to and from Matt Moriarty. Analyze and edit agenda. Discussions with Meghan Carter and Carl Frankovitch.	0.80

Fred Thompson, Motley Rice LLC

Digitek MDL

5/24/2010	Discussion with court concerning arrangements for tomorrow's meeting and status conference. Meeting with staff to determine capabilities of video conference. Prepare for status conference. Conference with M. Carter re: agenda, etc.	10.00
5/25/2010	Prepare for Status Conference and Status Conference with Judge Goodwin (telephonic)	1.2
5/25/2010	Deposition of Divya Patel. Travel back from deposition.	0.70
5/25/2010	Settlement Conference discussions with Judge Goodwin, Matt Moriarty, and Carl Frankovitch	1.00
5/28/2010	Conference with M. Carter re: Quantic/Parexel.	1
6/1/2010	Call with defendants.	0.5
6/1/2010	Conference call with PSC concerning plant inspection.	1
6/2/2010	Conference with M. Carter re experts and schedule. Review PTO rescheduling science day. Forward to staff to handle.	3
6/3/2010	Expert reports	8.2
6/4/2010	Expert reports & meetings	5.3
6/7/2010	Review expert reports. Conference with atty. Carter re: depositions.	3.4

Fred Thompson. Motley Rice LLC

Digitek MDL

6/7/2010	Call prep. Review and respond to e-mails. Meeting with atty. Carter. Conference with co-leads re: expert reports, depositions, etc.	4.9
6/8/2010	Expert review	7.5
6/9/2010	Conference with Judge Goodwin and Matt Moriarty	0.70
6/9/2010	Conference call with Dr. Somma/Spyglass . Coninue work on expert reports.	7.00
6/9/2010	Travel to Savannah and meet with expert Jim Farley. Analyze and review expert reports of Bliesner and Somma.	9
6/10/2010	Email w/ expert. Deposition preparation.	4.3
6/14/2010	Travel to NYC for meeting with defendants. Attend meeting. Travel back to SC.	10.5
6/15/2010	Draft/edit disclosures of exper witnesses and file.	2.5
6/18/2010	E-mails back and forth with P. Miller re: cancelling deposition of Talbot. Deposition preparation.	3.8
6/19/2010	Deposition preparation and document review.	7
6/20/2010	Prepare for deposition of Nelson. Emails to and from staff re: additional documents needed.	9.2
6/21/2010	Work with Digitek experts; questions about materials, etc. Travel to OH for deposition of Nelson. Prepare for deposition.	11
6/22/2010	Prepare for deposition; Deposition of Dr. Nelson. Travel back to SC.	10.5

Fred Thompson, Motley Rice LLC

Digitek MDL

6/26/2010	Preparation for deposition of Karen Frank.	5.2
6/27/2010	Review expert reports. Review of documents to prepare for Frank's deposition. E-mail to M. Carter; C. Scott re: grid.	8.4
6/28/2010	Prepare for deposition of Frank. Travel to Philadelphia.	9
6/29/2010	Multiple e-mails back and forth re: discovery and depositions. Conference with M. Carter re: upcoming depositions. Prepare for depositions; document review.	4.3
6/29/2010	Meeting with Dr. Frank and deposition preparation.	12
6/30/2010	Preparation for deposition. Deposition of Dr. Frank. Confernece with co-counsel explaining status. Travel back to SC.	15
7/2/2010	Talk to Expert Kenny, talk to Expert Frank with Meghan and Pete	0.8
7/6/2010	Meeting with M. Carter. E-mails with defense re: setting up conference call.	0.7
7/7/2010	Meeting with M. Carter.	0.9
7/8/2010	Conference with C. Frankovitch and M. Carter. Notify M. Carter of cancellation of deposition of Bliesner.	0.7
7/9/2010	E-mail from R. Dean re: meeting scheduling.	0.2
7/12/2010	MDL – prepare for deposition	0.7

Fred Thompson, Motley Rice LLC

Digitek MDL

7/13/2010	Conference with co-leads re: finances in common fund.	0.4
7/15/2010	Meeting with M. Carter.	0.6
7/16/2010	Prepare letter to PSC. Meeting with M. Carter to discuss.	0.4
7/23/2010	Meeting with M. Carter.	1.3
7/26/2010	Discussion of settlement criteria with M. Carter and C. Scott. Review draft from C. Frankovitch. Discuss with M. Carter, especially statutes. E-mails back and forth with defense counsel re: criteria.	1.9
7/27/2010	Meeting with M. Carter re: settlement.	0.3
7/28/2010	Meeting with M. Carter re: settlement. Travel to Cleveland for settlement discussions. E-mails back and forth with counsel re: scheduling. Prepare for meeting.	9.2
7/29/2010	Settlement meeting. Travel back to Charleston.	8.9
7/30/2010	Digitek strategy planning. Conference with M. Carter re: research needed re: adulterated pills. Conduct additional research.	3.8
8/2/2010	Conference with M. Carter and P. Miller. Meeting with M. Carter re settlement. Review e-mail from R. Dean and set up call to discuss.	0.9
8/3/2010	Meeting with M. Carter re: settlement.	4

Digitek MDL

8/4/2010	Conference with M. Carter; review term sheet from M. Moriarty., legal research and discuss with M. Carter.	1.4
8/4/2010	Conference with M. Carter re: letter from M. Moriarty. Review correspondence back and forth from co-counsel; Drafting of grids.	5
8/5/2010	Travel; Prepare for meeting.	10
8/6/2010	Lunch meeting re: settlement. Meeting with M. Carter and C. Frankovitch. Meet with Judge Goodwin and Defendants; Co-lead meeting. Travel back home. Review draft settlement agreement.	10.5
8/7/2010	Prepare for call. Call with M. Carter, C. Scott, and Garretson re: resolution. Further review and edits to settlement agreement; conference with Defendants.	1.3
8/9/2010	Conference with M. Carter. Emails back and forth with H. Bell and M. Carter re: resolution possibilities.	1.5
8/10/2010	Conference with M. Carter re: notifying PSC. E-mails back and forth. Conference with counsel re: settlement, meeting, agenda. Etc.	1.5
8/10/2010	Conference with M. Carter. Conference with co-leads. Drafting of letter to court. Continue work on settlement agreement.	5.9
8/11/2010	Travel	6.5

Fred Thompson, Motley Rice LLC

Digitek MDL

8/11/2010	Meeting w/ Defendants, C. Frankovitch and M. Carter. Call to Judge Goodwin.	8
8/12/2010	Travel home. Conference call with Plaintiff's counsel re: status. Review PTO 62.	6
8/13/2010	Conference with M. Carter re: responding to e-mail from M. Moriarty. Correspondence to PSC re: Philadelphia meeting. Conference with M. Carter re: what should be disclosed at meeting. E-mails back and forth with co-leads re: setting up meeting, points to discuss, etc.	4.1
8/15/2010	Settlement Agreement	1.8
8/16/2010	Conference with M. Carter re: PSC meeting. Draft agenda. Review settlement agreement.	3.5
8/17/2010	Prepare for call. Call w/ Defendants; Call w/ M. Carter and C. Frankovitch. Conference with F. Thompson and C. Scott re: Garretson. Travel to Philadelphia. Prepare for meeting	12
8/18/2010	Prepare for call. call w/ Moriarty, Frankovitch, and Carter. PSC conference. Dinner meeting.	9.5
8/19/2010	Travel. Working dinner with M. Carter, P. Miller and C. Frankovitch. Prepare for meeting. PSC meeting. Travel home.	14
8/20/2010	Call w/ Frankovitch, Carter, and Moriarty.	0.3

Digitek MDL

8/21/2010	Review settlement agreement. Conference calls with co-counsel re: settlement.	2.1
8/23/2010	Spend afternoon on responding to PSC e-mails and working on settlement agreement.	5.2
8/24/2010	Prepare for call. Call w/ Harry, Carl, Meghan and Defendants. Call with co-leads. Prepare correspondence to all counsel re: settlement. Conference with staff re: setting up conference call.	3.5
8/25/2010	Special Master Call. Conference with M. Carter re: settlement agreement, points which need to be made during call tomorrow, etc.	4.5
8/26/2010	Prepare for Call. Call with Plaintiffs' counsel re: resolution.	2.5
8/27/2010	Review draft settlement documents.	2.1
8/30/2010	Review and editing settlement documents. Prepare for call. Call with Plaintiffs' counsel re: resolution. E-mails back and forth with Plaintiffs' counsel re: pill testing question.	4.5
8/31/2010	Meeting with M. Carter re: draft of letter.	1.9
9/1/2010	Settlement documents.	2.5

Digitek MDL

9/2/2010	Meeting with M. Carter to discuss Medicare issues. Prepare for call. Call w/ Defendants; , Conference with C. Scott and M. Carter re: grid values & point max. Review correspondence from M. Moriarty. Various e-mails from Plaintiffs' counsel with questions re: settlement.	4.2
9/7/2010	Conference with M. Carter M. Moriarty re Mylan's change to settlement agreement. Review changes.	0.8
9/8/2010	Travel to WV for status conference. Connecting flight cancelled. Travel back. Multiple conferences with M. Carter and co-leads throughout day for status. E-mails back and forth from Ed Blizzard re: Lynn Baker.	7
9/9/2010	Meeting with M. Carter re: Professor Baker. Review correspondence from Dr. Baker.	1.2
9/10/2010	Settlement work	2.3
9/11/2010	Settlement work	3.5
9/13/2010	Meeting with M. Carter re: Professor Baker. Correspondence from Lynn Baker re: call.	0.8
9/15/2010	Sample letters for settlement.	0.5
9/20/2010	Conference call w/ Prof. Baker, Ed Blizzard, and Meghan Carter.	0.2
9/23/2010	Garretson call re: proposal.	0.5
9/29/2010	Settlement documents.	2

Fred Thompson, Motley Rice LLC

Digitek MDL

10/7/2010	Correspondence from Defendant re: settlement and opt outs. Conference with M. Carter re: settlement process status.	1
10/13/2010	Review e-mail from Angie Volk re: meeting.	0.2
10/18/2010	Prepare e-mail to M. Carter re: to do list.	0.5
10/19/2010	Travel to Charleston, WV for status conference. Meet with co-leads; prepare for conference.	8.2
10/20/2010	Prepare for Status Conference. Attend status conference, meet with co-counsel. Travel back to Charleston, SC	7.8
TOTAL:		1821.2

Meghan Carter, Motley Rice LLC

Digitek MDL Time

Date	Time	Time (hr in tenths)	Description
01/09/08		0.20	email rich about final search criteria
01/09/08		1.50	Work on protective order
01/09/08		2.50	finish up letter re direct filing
11/07/08		0.30	Meet w/ Fred Thompson Re-Digitek Project
11/11/08		1.00	Digitek PSC Conference Call
11/17/08		2.00	preparing, reading & printing documents for Status Conference. Read & commented on Fred's Budget Proposal
11/18/08		2.00	Meeting at Harry Bell's Office w/ some members of PSC
11/18/08		2.00	Meeting with Defendants
11/18/08		2.50	PSC Meeting
11/18/08		4.50	Travel to Charleston WV for Status Conference
11/19/08		3.00	At Court House For Status Conference
11/19/08		5.00	Travel back to Charleston, SC from Charleston, WV
11/20/08		0.80	read & added to Teresa's MDL update
11/21/08		0.00	Call with Dr. Nelson (Meghan did not attend)
11/21/08		0.80	Created list of things Plaintiffs agreed to do at Status Conference, created committee list, prepare for call
11/21/08		1.00	Digitek Lead Conf. Call (11AM EST)
11/24/08		1.30	Lextranet Presentation
11/24/08		4.00	Typed up PSC Mintues, researched other MDL's orders concerning appointment of treasurer, PSC organization and use of master complaints in MDLs. Created and organized to do list w/ deadlines, assignments & descriptions
11/25/08		0.30	Talk with Harry Bell re: discovery vendors
11/25/08		1.00	meet with Fred Thompson & Carmen Scott re MDL work & assignments
11/26/08		0.00	Status Conf in Charelstion W.Va. (Meghan did not attend)
12/01/08		0.20	Email w/ Vance Andrus re Master Complaint / reading master complaint examples

Meghan Carter, Motley Rice LLC

Digitek MDL Time

12/01/08		0.30	Talk w/ Fred about Master Complaint examples/samples
12/02/08		1.00	Going through emails to create committee lists/chart
12/02/08		1.50	Co-Lead Conference Call
12/03/08		0.30	Talk to Carmen re Pharm. Discovery
12/03/08		0.50	Talk to Fred re Discovery Letter & Master Complaint
12/03/08		1.30	work on committee lists, email to PSC re: committees
12/03/08		2.00	research master complaint examples
12/03/08		3.00	research pharm. Discovery, work on letter re discovery
12/04/08		0.50	Co-Lead Conference Call
12/04/08		0.80	email to committees, received email re time problems so checked all schedules and rescheduled calls on 12/5
12/04/08		4.00	Pulled complaints off pacer, making master list of states involved & counts included
12/05/08		0.50	Science & Expert Committee Call
12/05/08		0.50	Law & Pleading Committee Call
12/05/08		0.50	discovery Committee Call
12/05/08		0.50	Talked with Fred re Digitek Account/treasurer
12/05/08		1.30	emailing out documents to committee members that requested copies
12/05/08		1.50	Type committee meeting minutes in between calls
12/05/08		2.20	Working on master complaint
12/08/08		0.50	Talked to Harry re Digitek Bill/treasurer/funds
12/08/08		1.20	Worked on Discovery Letter, researching process
12/08/08		2.00	Typed Minutes from Committee Calls, added additional people to committee lists and committee email lists
12/08/08		2.50	Work on Master Complaint & researching Direct Filing
12/09/08		0.20	Talked to Angie Volk re: inconsistent dates online for status conf.
12/09/08		6.70	Pulled complaints off pacer, worked on master complaint
12/10/08		0.20	Set up Conf. Call
12/10/08		0.30	Talk to Carmen re Master Complaint
12/10/08		0.70	Talk to Fred re MDL deadlines, account etc
12/10/08		6.00	Drafting Master Complaint

12/11/08		0.50	Worked on to-do list and agenda for 12/12 lead call
12/11/08		0.50	Talked to Fred re accounts, to-do list & Agenda for 12/12 call
12/11/08		0.70	Concordance Demo
12/11/08		5.00	Drafting Master Complaint
12/12/08		1.20	Co Lead Call
12/13/08		1.00	worked on master complaint
12/14/08		0.00	Carmen looked over voluntary discovery letter
12/14/08		0.10	emailed out Defendants' proposals to Lead counsel to read
12/15/08		0.80	Voluntary Discovery Letter
12/16/08		0.20	Email Rich Hood for Advice on E-discovery ,search terms etc
12/16/08		0.20	reading over documents from bank & emailing bank about problems
12/16/08		0.50	Get Agenda done for call w/ Defendants
12/17/08		0.10	talked w/ Harry re PTO
12/17/08		0.30	Talk w/ Fred about PTO re bank & Called Angie to leave message concerning the PTO
12/17/08		0.50	Drafted Search Terms
12/17/08		0.60	Creating agenda for Friday's Calls
12/17/08		0.80	Call w/ Rich Hood re help with electronic discovery (getting advice on search terms & vendors)
12/17/08		1.00	Co-Lead Conference Call
12/17/08		1.20	Call with defendants
12/18/08		0.20	email defendants to make sure we have the most updated copies of preservation & lab protocol
12/18/08		0.30	Fred and I talked with Harry re PTO on account
12/18/08		0.30	Fred and I talked with Carl re PTO on account
12/18/08		0.50	Science & Expert Committee Call
12/18/08		0.50	emailing out documents to committee members that requested copies
12/18/08		0.70	Law & Pleading Committee Call
12/18/08		0.70	discovery Committee Call
12/18/08		1.00	Working on Drafts of Proposed PTO on account

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Digitek MDL Time

12/18/08		4.00	downloading complaints from Pacer for severance issue, organizing complaints & creating chart with information
12/19/08		0.30	email rich hood re search terms & e-discovery
12/19/08		0.30	Draft email letter to defendants re search terms.
12/19/08		0.30	going over letter to defendants w/ Fred
12/19/08		0.40	Call w/ Ed Blizzard re Digitek & missed committee call
12/19/08		2.00	Work on search terms list, combining terms sent in from PSC, reading over search term information from Camp (re seroquel)
12/22/08		3.00	sending out emails of master complaint to individuals, proofing master complaint, various digitek emails to schedule meetings and updates
12/23/08		0.30	email out preservation order to Andy and try to re-schedule meeting
12/23/08		0.30	Talk to Fred re ESI issues & postponing conversation on Preservation order
12/23/08		0.50	draft letter re preservation order & moving meeting w/ Defendants
12/23/08		0.50	talk to Rich re ESI issues
12/29/08		0.20	Call everyone to move conf. call re ESI
12/29/08		6.00	Severance Report, drafting, pulling complaints, docket lists, document lists etc
12/30/08		0.30	Met w/ Fred re Severance
12/30/08		0.30	Prepare Fred for Call
12/30/08		0.50	Prepare for ESI Call
12/30/08		0.70	Call w/ ESI guys
12/30/08		4.20	Severance Report, drafting, pulling complaints, docket lists, document lists etc
12/31/08		0.50	Met w/ Fred re Severance
12/31/08		0.50	Direct Filing - letter to Angie
12/31/08		5.50	Severance Report, drafting, pulling complaints, docket lists, document lists etc
01/02/09		0.10	sent out email to PSC members with cases that were included in severance order

01/02/09		0.10	email rich hood re marked up copy of the preservation order
01/05/09		0.50	Talk to Inventus Vendor about discovery platform
01/05/09		1.00	email Angie Volk re Direct Filing and review and send excel chart to her.
01/06/09		8.00	Research direct filing
01/07/09		0.10	email Harry about Inventus
01/07/09		0.50	Talk to Fred re: direct filing
01/07/09		2.00	incorporating changes into preservation order & retyping, working on search term criteria
01/07/09		5.00	Research direct filing, find other MDL orders, and draft direct filing letter
01/08/09		0.30	Email David Wilharm & Bill Bands each about master complaint and reviewing
01/08/09		1.00	update to-do list & get agenda together for lead call, get call time finalized & send out email to lead with documents & to do list for call
01/08/09		2.00	incorporating changes into preservation order & retyping, working on search term criteria & combining search term lists and reorganizing into and excel sheet .
01/09/09		1.00	Co Lead Call
01/12/09		1.00	Proof protective order & PFS
01/12/09		2.00	Draft letter to defendants re protective order, PFS, search terms etc
01/13/09		0.50	Talk with Fred re letter, PFS, protective order & preservation order
01/13/09		0.50	read 1/13 letter from defendants responding to our 1/13 letter & respond in email to lead
01/13/09		1.00	Presentation w/ Inventus re document depository
01/13/09		3.00	Work on letter to defendants, PFS, protective order & preservation order, email out drafts to lead, research Actavis Plant & recall dates for Preservation Cut-off date
01/14/09		0.20	Respond to email from John Adams (counsel in MDL) re severance order

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Digitek MDL Time

01/14/09		0.20	email angie / read angie's email to find out about response concerning Court holding off on severance
01/14/09		1.50	Billing & expenses draft letter & refine chart, go over with Fred & email out to Lead
01/14/09		1.50	Master complaint - looking up West Virginia Code, putting west virginia consumer count in and emailing out to group
01/15/09		0.30	Go over Master Complaint with Fred
01/15/09		0.30	Call Rich re discovery meeting
01/15/09		0.50	Printing & preparing for calls
01/15/09		0.70	Co Lead Call
01/15/09		1.00	work on PFS, editing and sending errors/edits to Defendants
01/15/09		1.50	Call with Plaintiffs and Defendants Lead
01/15/09		3.00	Work on master complaint (adding consumer counts)
01/16/09		0.10	Email/Call ESI guys about meeting in DC
01/16/09		1.00	Billing & expenses edit letter & email out to PSC
01/21/09		0.30	talk to Nate (inventus guy)
01/21/09		0.50	Talk to Fred re Master Complaint final changes
01/21/09		2.00	Work on finalizing Master Complaint to send to Defendants, including adding language for damages
01/21/09		3.50	Travel To DC
01/21/09		4.00	Get prepared for IT meeting in DC
01/22/09		1.00	Breakfast meeting w/ Fred & Rich
01/22/09		2.50	Meeting with Defendants re Preservation Order
01/22/09		5.00	Travel back to Charleston, SC from DC
01/23/09		0.30	emailing to lead /Michael Anderton regarding draft preservation agreement language
01/23/09		0.50	Fix tolling agreement per Lead's comments & David Wilharm's Comments, email to Defendants
01/23/09		0.50	Talk to Fred re Agenda, sending out voluntary discovery letter and tolling agreement
01/23/09		1.00	Co-Lead Conference Call

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Digitek MDL Time

01/23/09		2.00	Draft Tolling Agreement
01/26/09		0.30	Read emails from Harry re lack of communication in MDL, discuss with Fred
01/26/09		0.50	Get confirmation and email out voluntary discovery letter
01/26/09		1.00	Prepare materials for Fred for Meeting and conference
01/26/09		5.00	Research Severance for update to court
01/27/09		0.40	Read Defendants Status Supplement, letter re direct filing and skim CMO
01/27/09		11.30	Travel to Charlotte, stranded at airport, conf. call w/ Carl, Talked to Harry, Met with Madeleine & Erika from SHB at airport
01/28/09		0.50	prepare for calls
01/28/09		0.50	co lead call
01/28/09		0.50	Get time for PSC meeting & send out email to PSC
01/28/09		0.50	Start trying to get listserv's set up
01/28/09		1.00	Call with Defendants
01/28/09		1.80	Status Conf w/ Court
01/29/09		0.30	emailing with IT about listserv (problems setting up)
01/29/09		0.30	respond to email w/ counsel from MDL
01/29/09		0.50	trying to figure out counsel for Texas & Alabama State cases - trying to figure out Alabama's website, email Lance about it
01/29/09		0.50	Draft agenda for 1/30 PSC Call
01/29/09		1.00	Read protective order and do Email to lead comparing/constrasting the proposed paragraphs with prior versions
01/29/09		1.50	Doing to-do list based on notes from status conf., emailing lead about to-do list, re-doing to-do list after getting email from Harry regarding Court's Order concerning dates
01/30/09		0.20	email out agenda and email defendants re P.O. (Protective Order was Due today)
01/30/09		0.80	Co-Lead Conference Call
01/30/09		1.50	PSC Call
02/01/09		0.10	Email re Expert invoices

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Digitek MDL Time

02/02/09		5.00	research FDA warning letters, DOJ action, corporate docs (10k etc) to beef up master complaint
02/03/09		0.30	Read new Preservation Order
02/03/09		0.30	Meet w/ Fred and Rose re Master Complaint
02/03/09		0.50	Co lead call
02/03/09		0.50	add Plaintiffs comments to Defendants suggested preservation order
02/03/09		1.00	proofread master complaint
02/03/09		1.30	edit minutes to PSC call, send out PSC emails
02/04/09		0.50	Law & Pleading Committee Call
02/04/09		1.50	Work on master complaint
02/06/09		0.40	Co-Lead Conference Call
02/06/09		0.50	Proof Preservation Order
02/06/09		0.70	Call with Defendants
02/06/09		1.00	fix up severance letter brief and master complaint for submission, email to Debbie for Harry to sign and submit.
02/06/09		2.00	Master complaint
02/06/09		4.50	Severance letter Brief
02/09/09		0.80	Plaintiffs Lead Call
02/09/09		0.80	Call with Defendants
02/09/09		1.30	Read cmo, compare file, master complaint
02/09/09		3.00	research preservation/ scope of discovery information
02/10/09		6.00	Work on Case Management Order and motion for preservation
02/11/09		5.80	Work on CMO
02/12/09		0.50	Co-Lead Conference Call
02/12/09		1.00	Call with Defendants
02/12/09		4.50	work on letter to court re CMO etc
02/13/09		1.00	work on letter to Court
02/16/09		1.50	Conf. Call
02/17/09		0.20	emails back and forth trying to schedule calls
02/18/09		0.30	Call w/ Carl
02/18/09		0.30	prepare

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Digitek MDL Time

02/18/09		0.50	PFS - comparing drafts
02/18/09		0.90	Call w/ Rich hood
02/18/09		1.00	Call w/ Defendants re search terms
02/18/09		1.00	read CMO, work on fact sheet,
02/18/09		1.50	Call with Defendants
02/19/09		0.30	talk to Ashley Ownby
02/19/09		2.00	Go over new PRS and send changes to Defendants
02/20/09		1.00	set up listserv and email out emails
02/20/09		1.70	Call with Defendants
02/20/09		2.00	email labs to PSC, talk to Pete Miller, Talk to Dr. Kawalski,
02/22/09		2.00	update CMO, email defendants, work on listserv
02/23/09		0.50	look over CMO, talk to Fred about it, respond to Kristen
02/23/09		1.00	e-discovery, search terms Call
02/23/09		1.00	Get things together for Fred
02/23/09		3.00	Timelines and printing etc
02/24/09		2.00	meet with Carl, Harry and Fred
02/24/09		2.50	Meet with Defendants
02/24/09		5.00	Travel to Charleston WV
02/25/09		1.50	Meet at Harry's office
02/25/09		1.50	at court, conference with Judge Stanley
02/25/09		5.50	Travel back to SC
02/26/09		0.80	PSC Call
02/26/09		1.00	get agenda for call together
02/26/09		1.00	work on case grid, houston conf setting up
02/27/09		1.00	Call with expert
02/27/09		1.00	PSC meeting planning
03/01/09		2.50	went over PFS, drafted counter preposal for e-discovery
03/02/09		0.50	Talk with Fred and Carmen re Pill testing
03/02/09		5.00	work on St. Regis contract, Digitek Grid (with Carmen), Call with Carl re pill testing (w/ Carmen), email re March 10th meeting, meeting agenda etc

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Digitek MDL Time

03/03/09		3.50	email out e-discovery, search terms, work on Houston PSC meeting, research Pills/ USP
03/04/09		1.00	Talk with Fred & Carl re status conf.
03/04/09		2.00	work on Digitek listserv
03/04/09		6.00	Travel to W.Va
03/05/09		0.10	Talk to Dr. Nelson
03/05/09		0.70	Email re PSC meeting etc
03/05/09		3.00	Status Conf
03/05/09		5.00	Travel
03/06/09		1.00	Talk to Dr. Nelson and Carl
03/06/09		4.50	sent out preposl to inventus, agenda for PSC, tolling agreement, talk to carl re PFS (15 min)
03/08/09		0.30	email discovery order to Defendants etc
03/09/09		0.30	go over agenda for PSC meeting with Fred
03/09/09		2.00	Dinner with PSC
03/09/09		3.30	re-do PFS, timeline, work on meeting stuff
03/09/09		4.00	Travel to Houston
03/10/09		5.00	Travel
03/10/09		5.50	PSC Meeting
03/11/09		6.00	Talk to Matt/Fred twice on phone, work on PFS, email update, conduct of discovery order, talk to Carl
03/12/09		3.50	go over direct filing agreement and discuss non-digitek preservation with Fred & Rich, read over former employee resumes of Actavis people
03/13/09		0.50	send email to Defendants with non dig preservation order, send email to PSC with PFS, send email to all counsel with PFS
03/16/09		1.00	Co-Lead Conference Call
03/16/09		2.00	update to-do list, answer MDL question emails
03/16/09		2.30	Draft update for MDL, talk to Pat Avery re complaint and investigator, talk to Fred to fix update
03/17/09		0.30	go over direct filing and send to defendants

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Digitek MDL Time

03/17/09		0.30	conference call with defendants
03/17/09		0.50	talk to carl re nondig preservation order, conduct of discovery and case criteria
03/17/09		0.50	go over ediscovery agreement and respond re rule 502
03/17/09		1.00	Go over non-digitek preservation order & conduct of discovery order, try to get meeting scheduled, answer questions re assessment, digitek grid
03/17/09		1.30	conduct of discovery track changes, compare e-discovery to Fed R. Civ. P.
03/18/09		3.00	emails with Ashley, Pete, Carl, Fred, electronic discovery agreement, protective order
03/19/09		0.30	Talk to Carl re search terms and protective order
03/19/09		0.30	Talk to Carl re protective order
03/19/09		0.30	talk to Pete Miller re discovery
03/19/09		1.00	electronic discovery
03/19/09		2.00	work on electronic agreement, email rich, direct filing, talk to Carl re electronic discovery and direct filing
03/20/09		0.80	Talk to Carl re PTO # 11, protective order and planning in general
03/20/09		1.00	Talk to Fred re MDL
03/20/09		1.50	Digitek working on order and talk to Defense counsel etc
03/26/09		1.00	Call w/ Fred and Carl, talk to Defendants re CMO
03/30/09		2.00	Co-Lead Conference Call etc
4/6/2009	11:35-11:40	0.1	Email short form complaint to Bobbie Blanchard
4/6/2009	3:30-3:32	0.1	Call Marissa Re discovery
4/6/2009	4:45-4:50	0.1	Email Pat Avery timeline w/ dates
4/6/2009	3:45-4:45	1.5	Document review/repository/vendor chart
4/7/2009	5:55-6:00	0.1	Call Harry's Office, speak with Debbie
4/7/2009	10:20-10:32	0.2	Discovery platform chart
4/7/2009	2:22-2:33	0.2	Email Rich Hood
4/7/2009	3:45-3:56	0.3	Call St. Regis about Bill
4/7/2009	2:00-2:22	0.4	Talk to Fred re Discovery vendor and interrogatories

4/7/2009	8:55-10:20	2.1	RFP & Rogs
4/7/2009	12:00-12:24	2.1	RFP & ROG
4/8/2009	10:07	0.1	Email Carl
4/8/2009	11:06-11:07	0.1	Call Harry – Not in both times then email
4/8/2009	12:00-12:10	0.2	Talk to Fred re-discovery
4/8/2009	1:40-1:45	0.2	Respond to email re P.O. and looked up PO to compare
4/8/2009	2:36-2:54	0.3	Talked to Marissa and Fred re RFP & Rogs
4/8/2009	9:30-9:45	6.2	Work on RFP & Rogs, email out to group
4/9/2009	9:28-9:30	0.1	Email Rich Hood re discovery vendor
4/9/2009	11:36-11:38	0.1	Talk to Marissa on the phone
4/9/2009	2:44-2:50	0.1	Talk to David Wilharm about interrogatories
4/9/2009	10:11-10:21	0.2	Talk to Carmen re Interrogatories
4/9/2009	10:21-10:40	0.4	Updating Rogs with Carmen's changes, pinpointing proper date
4/9/2009	12:00-12:20	0.4	Talk to Fred about RFP & ROGS
4/9/2009	3:55-4:10	0.5	Talk to Fred & Marissa re discovery, documents, and organizational depositions
4/9/2009	5:35-6:05	0.5	Phone call w/ Fred & Rich Hood re Discovery vendors
4/9/2009	9:36-10:10	0.6	Incorporate David Wilharm's changes to Rogs & formatting
4/9/2009	2:03-2:30	0.6	RTP & Rogs, add changes & formatting
4/9/2009	11:05-11:36	0.8	Add David's changes to RFP & formatting
4/9/2009	2:57-3:55	1	Documents
4/9/2009	4:10-4:25	3.2	Document review
4/10/2009	8:56-8:58	0.1	Forward PDFs to facslaw (David)
4/10/2009	9:32-9:34	0.1	Email David about state discovery, attaching word versions of MDL discovery
4/10/2009	9:44-9:50	0.1	Looking over Digitek emails from Defendant
4/10/2009	2:10-2:13	0.1	Email w/ Carmen about document review platform and ANDA
4/10/2009	2:37-2:38	0.1	Email back Nick Clevenger re short form complaint
4/10/2009	9:50-9:58	0.2	Talk to Marissa about Fred's Digitek to do list

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Digitek MDL Time

4/10/2009	10:05-10:45	0.7	Meet w/ Fred concerning Digitek, who called Michael Anderton re Electronic Discovery Agreement & Madeleine McDonough re Tolling Agreement
4/10/2009	11:00-11:34	1.2	Document Review
4/10/2009	2:17-2:36	2.5	Document Review
4/13/2009	10:28-10:34	0.1	Email to PSC
4/13/2009	11:43	0.1	Send out Digitek email to lead re: time of call today
4/13/2009	12:41-12:42	0.1	Send out Call-in #
4/13/2009	6:08-6:11	0.1	Re-send email to PSC
4/13/2009	9:55-10:05	0.2	Meet w/ Fred re Digitek to do/calls this week
4/13/2009	9:50-9:55	0.3	Call Marissa and talk re MDL
4/13/2009	10:15-10:28	0.3	Email to lead
4/13/2009	1:30-1:45	0.4	Prepare for 2:00 lead counsel call.
4/13/2009	3:58-4:17	0.4	Talk to Debra Phifer from Crivella West
4/13/2009	5:18- 5:39	0.4	Responding to Crivella West's email re discovery
4/13/2009	2:00-2:51	0.9	Co-Lead Call
4/13/2009	3:05-3:54	0.9	Respond to email from Holly Gibson, Pete Miller, Fred re Nelson call, emailing Inventus and Crivella West re setting up meetings tomorrow morning.
4/13/2009	4:17-4:52	0.9	Responding to email from Pete Miller and checking listserv website to see why PSC email didn't go out. Email with IT re listserv, respond to Inventus email & Crivella West email. Send out email to lead re meeting time and call in #s
4/13/2009	6:20-8:15	2	Email Carl about Dr. Nelson documents and Protective Order, go through documents to pick out the documents to send to Dr. Nelson.
4/14/2009	9:15-9:20	0.1	Get documents ready to send to Dr. Nelson & and explain sending to Marissa with PO
4/14/2009	11:16-11:20	0.1	Email Inventus new proposal to Co- lead
4/14/2009	11:25-11:28	0.1	Call Dr. Nelson to confirm receipt of documents and to explain protective order (if he has any questions). No answer
4/14/2009	1:28-1:32	0.1	Talk to Dr. Nelson

4/14/2009	8:12-8:19	0.2	Get documents ready for call and send out information email to lead
4/14/2009	1:32-1:41	0.2	Talk to Marissa about call/documents and respond to email from PSC member about service
4/14/2009	2:45-2:55	0.2	Talk to Fred about call, Try to contact Pete Miller
4/14/2009	7:15-7:32	0.2	Respond to Michael Anderton re conduct of discovery and tolling, respond to Shamas M. re tolling, sent out PSC email re discovery
4/14/2009	8:25-9:15	0.9	Call w/ Inventus
4/14/2009	1:54-2:45	0.9	Get ready for call & Call w/ Dr. Nelson
4/14/2009	9:45-10:55	1.2	Discuss with Fred Inventus & Crevella West
4/14/2009	9:20-10:45	1.5	Call w/ Crivella West
4/15/2009	10:54-10:56	0.1	Email Jeannie re time
4/15/2009	1:35-1:36	0.1	Talk to Marissa re schedule
4/15/2009	4:05-4:08	0.1	Check schedule for Thursday call
4/15/2009	9:45-9:57	0.2	Talk to Carl F. On the phone re Digitek meeting times, documents etc.
4/15/2009	3:50-3:58	0.2	Try to track Fred down to get his schedule for Friday for call and go over Digitek 30b6
4/15/2009	4:24-4:40	0.3	Email to lead group re Fred's schedule., call jeannie about time, Work on 30(b)(6)'s
4/15/2009	4:40-4:58	0.3	Talk to Carl
4/15/2009	2:25-2:49	0.4	Corp. Rep 30(b)(6)
4/15/2009	10:04-10:35	0.6	Re-sending Digitek PSC emails ... finally success!
4/15/2009	11:34-12:20	0.8	Corp. Rep 30(b)(6)
4/15/2009	2:49-3:48	1	Talking to Paul Turner from Carlile firm about MDL – questions about PFS, Defendants, Short-Form complaint and severance
4/15/2009	5:45-7:00	1.3	Work on 30(b)(6)s
4/16/2009	9:12-9:14	0.1	Email Pete Miller re Call w/ Fred
4/16/2009	9:15-9:20	0.1	Work on 30(b)(6)
4/16/2009	9:31-9:32	0.1	Email all lead re meeting today
4/16/2009	10:24-10:26	0.1	Email Debbie re PTO # 20
4/16/2009	4:11-4:17	0.1	Talk w/ Ashley Ownby

4/16/2009	6:05-6:10	0.1	Emailing documents to Pete Miller for Dr. McNair.
4/16/2009	9:20-9:30	0.2	Talk to Fred re Meeting today & discovery vendors
4/16/2009	4:17-4:25	0.2	Work on updating Tolling Agreement.
4/16/2009	10:00-10:18	0.3	Talk w/ Fred & Marissa re 30(b)(6) format & areas, try to call Pete Miller, Follow up w/ Rick Meadows and look over Crivella West Proposal.
4/16/2009	2:58-3:15	0.3	Talk to Pete Miller
4/16/2009	3:15-3:30	0.3	Talk to Fred re changes to tolling agreement
4/16/2009	3:57-4:10	0.3	Talk w/ Pete Miller
4/16/2009	1:01-1:20	0.4	Talk to Fred about upcoming Call
4/16/2009	6:11-6:33	0.4	Email to Defendants re other Digitek issues
4/16/2009	11:07-11:37	0.6	Work on 30(b)(6)'s
4/16/2009	5:17-6:04	0.9	Tolling agreement and sending new proposal to Defendants
4/16/2009	12:04-1:00	1	Talk to Marissa about what Fred needs for 1:30 call. Look over Conduct of Discovery proposal comparing to notes from the last call concerning it.
4/16/2009	1:30-2:58	1.5	Call w/ Defendants.
4/17/2009	4:15-4:20	0.1	Email Crivella West re going through the kiosk.
4/17/2009	12:10-12:17	0.2	Respond to Carmen's email about filing/tolling re MDL
4/17/2009	9:35-9:50	0.3	Go over 30(b)(6)'s w/ Fred
4/17/2009	9:50-10:08	0.3	Review 30(b)(6) and send out to lead
4/17/2009	10:55-11:08	0.3	Talk to Carl
4/17/2009	11:37-11:50	0.3	Talk to Carl
4/17/2009	12:05-12:10	0.6	Talk to Marissa, we both start reviewing for typos
4/17/2009	8:25-9:30	1.1	Work on 30(b)(6)
4/17/2009	2:10-2:35	1.5	Finish up 30(b)(6)'s, scan and email to Defendants
4/20/2009	9:25-9:30	0.1	Email Lead re 30(b)(6) depositions
4/20/2009	2:20-2:25	0.1	Talk to Carl re Call's scheduled
4/20/2009	3:17-3:20	0.1	Talk to Carmen re Recordtrak
4/20/2009	4:22-4:27	0.1	Send email to Rhonda Clement (Ashley Ownby)
4/20/2009	4:37	0.1	Email out to lead, email Debbie

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Digitek MDL Time

4/20/2009	5:00-5:05	0.1	Email Debbie re Plaintiffs Counsel List
4/20/2009	4:00-4:15	0.3	Talk to Marissa & Fred re Digitek
4/20/2009	6:40-7:00	0.4	Digitek – sending out emails to lead, pete miller etc
4/20/2009	5:30-6:00	0.5	Talk w/ Fred re Digitek
4/20/2009	2:55-3:00	0.6	Get Documents printed and scanned
4/21/2009	9:18-9:20	0.1	Respond to Crivella West Email
4/21/2009	11:29-11:32	0.1	Talk to Carmen
4/21/2009	11:35-11:39	0.1	Email out call in #'s to lead & Pete Miller/McNair
4/21/2009	11:39-11:42	0.1	Email back Rhonda Clement
4/21/2009	11:00-11:06	0.2	Finish email re Fred's date and CMO dates
4/21/2009	1:03-1:11	0.2	Talk to Tim Karen re PTO 16
4/21/2009	3:26-3:33	0.2	Talk to Beth Klein re tolling
4/21/2009	8:30-8:45	0.3	Reading email from Defendants
4/21/2009	11:43-12:00	0.3	Get ready for call w/ McNair
4/21/2009	2:35- 2:48	0.3	Send out tolling email
4/21/2009	2:48-3:00	0.3	Send out email to listserv re attending status conference
4/21/2009	6:07-6:21	0.3	Work on AAJ listserv, get list from Rose, Call Fred and he said wait until AM.
4/21/2009	10:00-10:20	0.4	Go over Digitek stuff w/ Fred
4/21/2009	11:06-11:29	0.4	Talk to Dr. Nelson
4/21/2009	1:40-2:00	0.4	Re-type Tolling email
4/21/2009	12:00-12:30	0.5	Call w/ Dr. McNair
4/21/2009	3:00-3:25	0.5	Field Calls re tolling, look up SOL dates
4/21/2009	4:15-4:45	0.5	Talk w/ Fred re questions on tolling, and sending out response to email
4/21/2009	5:31-6:00	0.5	Talk to Jonathon Adams re Digitek MDL.
4/21/2009	10:21-10:55	0.6	Called Carl (tried Harry) and Talked to Matt Moriarty re tolling, Actavis Elizabeth etc.
4/21/2009	2:00-2:35	0.6	Co-lead Call
4/21/2009	9:20-10:00	0.7	Respond to Digitek Emails, go over information in emails w/ calendar etc

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Digitek MDL Time

4/21/2009	3:34-4:14	0.7	Field Calls re tolling, look up SOL dates
4/21/2009	4:45-5:31	0.8	Field Calls re tolling, look up SOL dates
4/21/2009	12:30-1:03	0.9	Digitek Stuff – tolling email, etc.
4/22/2009	11:33-11:39	0.1	Listen to Digitek messages
4/22/2009	12:27-12:29	0.1	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	12:29-12:31	0.1	Talked to Bill Arnold from Patrick Mulligan's office
4/22/2009	12:32-12:36	0.1	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	12:37-12:38	0.1	Talked to Paul Turner re question on Tolling
4/22/2009	12:50-12:53	0.1	Talked to Stacy Hauer
4/22/2009	1:41-1:45	0.1	Talked to Crag Croner
4/22/2009	2:07-2:08	0.1	Talked to John M. from Inventus
4/22/2009	2:34-2:37	0.1	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	2:37-2:43	0.1	Talked to Debbie Ziegler
4/22/2009	5:43-5:45	0.1	Talked to Mark Drake (?) re tolling agreement
4/22/2009	6:47-6:53	0.1	Talk to Debbie re Atty listing and PSC meeting time
4/22/2009	11:40-11:49	0.2	Talk to Carl re tolling
4/22/2009	11:49-11:57	0.2	Talk to Doug, a lawyer from LA, talked briefly about tolling in LA
4/22/2009	12:15-12:27	0.2	Talked to Deb Hogeluct from Ball, Kirk & Holm re MDL
4/22/2009	12:38-12:49	0.2	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	2:31-2:33	0.2	Left Message for Sal, got Sal's message, talked to him
4/22/2009	9:50-10:05	0.3	Email to AAJ Lit group re tolling in the MDL.
4/22/2009	11:58-12:14	0.3	Working on Tolling chart
4/22/2009	5:25-5:41	0.3	Talk w/ Fred re Spreadsheet and sending out
4/22/2009	10:06-10:30	0.4	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	2:09-2:31	0.4	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	2:48-3:09	0.4	Talk to Fred re LA cases and spreadsheet
4/22/2009	8:30-9:00	0.5	Digitek emails
4/22/2009	1:35-1:41	0.5	Field Calls & emails re Tolling, work on tolling spreadsheet
4/22/2009	9:15-9:50	0.6	Tolling Chart
4/22/2009	7:05-7:36	0.6	Updating listserv
4/22/2009	5:45-6:30	0.8	Field Calls & emails re Tolling, work on tolling spreadsheet

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Digitek MDL Time

4/22/2009	10:30-11:33	1.1	Crivella West
4/22/2009	3:09-5:15	2.2	Field Calls & emails re Tolling, work on tolling spreadsheet
4/23/2009	9:38-9:42	0.1	Update listserv
4/23/2009	10:10-10:15	0.1	Answer several emails re MDL
4/23/2009	1:19-1:25	0.1	Email Rhonda re chart of actions in MDL
4/23/2009	10:03-10:10	0.2	Speak w/ Ken Dijan re MDL, PFS and send email with PFS and PTO # 16.
4/23/2009	2:00-2:09	0.2	Read Digitek Emails
4/23/2009	2:20-2:29	0.2	Talk to Pete Miller
4/23/2009	5:50-5:57	0.2	Follow up on MDL emails to Pete Miller and Doug
4/23/2009	9:42-10:02	0.3	Update Tolling Spreadsheet
4/23/2009	11:15-11:32	0.3	Subpoena
4/23/2009	11:33-11:50	0.3	Spoke with Billy Thise re Digitek MDL
4/23/2009	11:50-12:04	0.3	Talked w/ Fred re Tolling
4/23/2009	5:15-5:32	0.3	Following up w/ MDL counsel re tolling
4/23/2009	10:53-11:15	0.4	Update Tolling spreadsheet, email out to lead, procedure for severing?
4/23/2009	12:04-12:36	0.6	Talk to Defendants re tolling agreement
4/23/2009	12:37-1:19	0.8	Update tolling agreement and email out
4/23/2009	2:45-4:50	2.1	Sending out tolling emails to counsel that emailed in lists
4/24/2009	11:25-11:29	0.1	Sent email re tolling to Matt & Ericka
4/24/2009	9:36-9:45	0.2	Digitek MDL emails
4/24/2009	7:03-7:20	0.3	Email out PFS & order
4/24/2009	6:55-7:09	0.3	Respond to Emails re tolling, email to Rebecca Betts re Agenda.
4/24/2009	11:15-11:19	0.4	Receive call from Carol at the Schmidt Law Firm re tolling and emailed her
4/24/2009	1:00-1:25	1.5	MDL – answer questions re tolling agreements
4/27/2009	9:25-10:00	0.6	Answer emails re Digitek & get ready for call
4/27/2009	9:15-10:00	0.8	Type up minutes from PSC Call
4/27/2009	2:00-2:53	0.9	PSC Call
4/27/2009	10:00-11:00	1	Co-lead call w/ Defendants

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Digitek MDL Time

4/27/2009	10:00-11:03	1.1	Get Ready for Status Conference
4/27/2009	11:00-12:30	1.5	Get dates for deposition, schedule travel to W.Va, Send correct notice to Defendants, Respond to MDL listserv, Contact Lanier & Sanford (for O'Quinn) re PSC applications, Contact Rich Hood re discovery vendors.
4/27/2009	12:40-2:00	2.4	Talk to Angie re setting up Call-in #, email listserv back re PSC, get agenda together for Fred for call
4/27/2009	2:53-6:00	3.2	Digitek. Getting dates for calls, Getting Call – in # for status conf, email listserv re call in #, email defendants re call in #, take people off listserv/add people to listserv, return calls re MDL PFS (Tiffany from Dijan, Paul Turner), Email Bill Arnold re Tolling Agreement, Call Stacy Little re O'Quinn's PSC application.
4/28/2009	8:00-9:45	1.8	Digitek – email PSC etc
4/28/2009	9:00-11:45	2.8	Get ready for status conference
4/28/2009	4:15-8:00	3.8	Digitek, get ready for status conference
4/28/2009	9:45-3:15	5.5	Travel to W.VA.
4/29/2009	8:00-8:40	0.8	Talk w/ Fred, Carl & Teresa re Status Conf.
4/29/2009	7:00-8:00	1	Get Ready for Status Conference, - finishing timeline, printing papers etc
4/29/2009	8:40-10:15	1.6	Status Conference
4/29/2009	4:40-6:25	1.8	Digitek MDL stuff including emailing out Amended PFS to listserv w/ due dates (also making word document fillable), talking to Mary Ellen Morris re questions about Digitek MDL, looking over conduct of discovery order, emailing 30(b)(6) notices to Pete Miller.
4/29/2009	10:15-4:40	6.5	Travel from W.Va to SC
4/30/2009	9:55-10:00	0.1	Talk to Staci & Sandy about Digitek listserv
4/30/2009	10:05-10:10	0.1	Send out email to PSC w/ reminder, forward email to Lead
4/30/2009	11:19-11:23	0.1	Email back Erik Walker re Call today.
4/30/2009	8:52-9:00	0.2	Make copies & get ready for Call
4/30/2009	10:10-10:20	0.2	Talk to Fred about calling new PSC members, call today and email from listserv
4/30/2009	9:42-9:55	0.3	Talk to Fred re call

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Digitek MDL Time

4/30/2009	5:20-5:35	0.3	Talk to Carmen about Case critieria and call w/ dr. Nelson
4/30/2009	2:00-2:24	0.4	Call w/ Law & Pleading Committee
4/30/2009	2:24-3:00	0.6	Calls w/ PSC
4/30/2009	4:45-5:19	0.6	Talk to & email information to Billy Thies re Digitek MDL
4/30/2009	9:00-9:41	0.7	Call w/ Defendants
4/30/2009	10:20-11:00	0.7	Track down information for Fred to Contact PSC people
4/30/2009	11:53-12:40	0.9	Look over motions for today's call, looking up state products liability law too.
4/30/2009	6:00-7:10	1.2	Work on subpoena
4/30/2009	3:15-4:45	1.5	Working on Subpoena
5/1/2009	1:10-1:12	0.1	Email Defendants re time needed for 30(b)(6) depositions
5/1/2009	1:50-1:52	0.1	Email rich hood re document
5/1/2009	2:00-2:03	0.1	Email to lead re status conf. date
5/1/2009	3:08-3:13	0.1	Figure how to file new PSC application on ECF and email d-kuttles
5/1/2009	4:31-4:37	0.1	Email defendants re deposition dates
5/1/2009	4:37-4:42	0.1	Send subpoena and company information to lead (also looked up company profile and sent pdf)
5/1/2009	11:21-11:29	0.2	Update Listserv after email from Nick Clevenger.
5/1/2009	1:00-1:10	0.2	Talk to Fred about time needed for depositions
5/1/2009	1:53-2:00	0.2	Talk to Fred re dates for Oct. Status Conference, about document repository and go over subpoena
5/1/2009	2:55-3:07	0.2	Talk to Fred & email to Lead re deposition dates
5/1/2009	2:40-2:55	0.3	Talk to Rich Hood re document review platforms.
5/1/2009	10:50-11:10	0.4	Subpoena
5/1/2009	11:30-11:50	0.4	Work on Subpoena
5/1/2009	2:20-2:40	0.4	Work on notices, emailing Michael about location
5/1/2009	4:10-4:31	0.4	Talk to Carl Re Subpoena, hearing in West Virginia consolidation (testing, settlement etc), document depository and dates for depositions
5/1/2009	9:45-10:20	0.6	Going back through Digitek Emails to make sure I didn't miss anything etc

5/1/2009	4:42-5:20	0.7	Work on getting dates for quality rep, including sending email to defendants and lead. Also scanning in amended notices for service.
5/1/2009	3:14-4:00	0.8	Figure out Subpoena rules and talk to Bob H. about how to do Subpoena in NJ.
5/1/2009	1:13-1:50	0.9	Finish up subpoena.
5/4/2009	10:26-10:28	0.1	Respond to Pete Miller's email re subpoena
5/4/2009	10:32-10:37	0.1	Respond to Pete Miller's email re deposition notices
5/4/2009	11:42-11:44	0.1	Lookover caselaw emailed by Bill Bands
5/4/2009	5:10-5:15	0.1	Read over conduct of discovery order and send email to Defendants Lead Counsel
5/4/2009	5:30-5:45	0.25	Digitek Email
5/4/2009	2:33-2:47	0.3	Talk to Carl
5/4/2009	10:38-11:11	0.6	Send out email to PSC re motions to dismiss, respond to email re deposition notices.
5/4/2009	2:47-2:50	1.1	Get Notice of Subpoena done and served on Defendants
5/5/2009	9:25-9:27	0.1	Email Injunction Complaint to Rhonda Clement
5/5/2009	11:03-11:05	0.1	Read email from Rebecca Betts, Search email and then email Harry & Carl.
5/5/2009	11:18-11:23	0.1	Give Marissa letters to copy and send out
5/5/2009	11:34-11:36	0.1	Read Harry's email and Respond to Rebecca Bett's email re authorization to sign Harry & Carl's names .
5/5/2009	2:12-2:15	0.1	Answer phone call question re service of PFS
5/5/2009	5:50-5:55	0.1	Talk to Marissa about getting documents served in Digitek
5/5/2009	10:00-10:08	0.2	Talk to Sandy re Records Trak
5/5/2009	10:32-10:45	0.25	Email re NDC #'s
5/5/2009	9:40-9:57	0.5	Getting Digitek Stuff together & organized
5/5/2009	3:30-4:35	1.1	Talking w/ Fred re Digitek to do list, called Roger Drake, Called Carl re Document Vendor
5/5/2009	5:55-7:02	1.2	Get Notices amended with new location, fight with scanner, get notices scanned and emailed out to defendants, Ed Blizzard & Pete Miller

5/6/2009	9:05-9:07	0.1	Respond to Staci/Carmen's email re NDC #'s
5/6/2009	9:07-9:11	0.1	Respond to Drake Rogers email and send Rog/RTP to him.
5/6/2009	9:56-9:58	0.1	Looking through email re concerns about PFS
5/6/2009	10:08-10:11	0.1	Email Defendants re PFS
5/6/2009	10:24-10:26	0.1	Talk to Fred re Crivella West
5/6/2009	10:32-10:34	0.1	Talk to Sandy Summers re service of PFS
5/6/2009	10:58-11:00	0.1	Read & Respond to Carl's email re service of PFS
5/6/2009	4:07-4:10	0.1	Talk to Marissa re Fred's schedule
5/6/2009	8:54-9:06	0.2	Email Harry Re document review etc
5/6/2009	9:38-9:47	0.2	Looking through email re concerns about PFS
5/6/2009	9:58-10:07	0.2	Answer Mary Ellen's question re direct filing and tolling in MDL
5/6/2009	3:02-3:13	0.2	Talked to Rhonda & Ashley – FOIA documents came in
5/6/2009	3:13-3:25	0.2	Look over caselaw for Bobbie re distributor/Mylan motion
5/6/2009	3:25-3:35	0.2	Read Matt's email and go see Fred about schedule
5/6/2009	3:45-3:54	0.2	Checking Schedule & pacer to incorporate into to do list
5/6/2009	3:54-4:07	0.2	Spoke with Aditi at John Malkinson's office and then John Malkinson re PFS and a qualifying statement
5/6/2009	6:03-6:10	0.2	Email D. Plymale re PFS
5/6/2009	6:15-6:20	0.2	Call Fred re Beasley Allen Call, email Rose back about the same thing.
5/6/2009	10:11-10:24	0.3	Talk to Carl re Crivella West
5/6/2009	10:35-10:50	0.3	Email Defendants re PFS
5/6/2009	8:05-8:27	0.4	Talk to David Wilharm re Crivella West and forward information from Inventus to him
5/6/2009	11:06-11:20	0.4	Update To-Do list
5/6/2009	8:27-8:54	0.5	Going through email etc
5/6/2009	5:30-6:00	0.5	Talk to Fred re Digitek issues while he's gone – gave me letter to send to listserv
5/6/2009	4:10-5:15	1.1	Looking over FOIA sheet & reformatting
5/7/2009	10:05-10:07	0.1	Email Carl
5/7/2009	10:07-10:09	0.1	Call Nicole at Beasley Allen re MDL Questions

5/7/2009	10:12-10:14	0.1	Email Rose & Meagan re Digitek
5/7/2009	10:40-10:42	0.1	Call Debbie re adding Ashcraft and Jerrell to listserv
5/7/2009	10:58-10:59	0.1	Respond to Nicole's email
5/7/2009	11:00-11:03	0.1	Respond to Stacy Hauer's email re insurance information for Response to Motion
5/7/2009	11:04-11:09	0.1	Email lead re conduct of discovery and extension to discovery requests
5/7/2009	11:09-11:11	0.1	Email Michael Anderton
5/7/2009	1:56-1:57	0.1	Respond to Jeannies email
5/7/2009	1:57-2:00	0.1	Look for Fed Ex documents
5/7/2009	2:10-2:14	0.1	Get message from Pete Albanus, and call him back no answer
5/7/2009	2:15-2:16	0.1	Read Fred's email re conduct of discovery .
5/7/2009	2:28-2:32	0.1	Send out email to Lead re Crivella West Training
5/7/2009	2:32-2:38	0.1	Send email to Rich Hood Re 30(b)(6) deposition of computer systems
5/7/2009	3:08-3:13	0.1	Email Matt & Ericka about call concerning PFS
5/7/2009	5:43-5:50	0.1	Talk to Carl re discovery deadlines, PFS and Don Ernst's case.
5/7/2009	6:33-6:39	0.1	Send email to Dr. Nelson
5/7/2009	6:39-6:41	0.1	Look up Recordtrak contact information, found website but not a person to contact
5/7/2009	7:05-7:08	0.1	Look into firm recordtrak information for actual contact
5/7/2009	9:56-10:05	0.2	Return Toni Boaz's call from White, Cirrito & Nally re Service and filing of Affidavits of Service / Waivers of Service. Told her there is a drop down menu on pacer/ecf
5/7/2009	10:45-10:55	0.2	Check pacer for any updates/ motions/ service information (how to file service documents)
5/7/2009	11:13-11:21	0.2	Check pacer for service information (how to file service documents)
5/7/2009	1:43-1:50	0.2	Talk to Stacy Hauer re Medicare Secondary Payer Claim
5/7/2009	3:00-3:07	0.2	Talk to Pete from Morgan & Morgan re severance
5/7/2009	10:16-10:34	0.3	Write Fred's letter to listserv

5/7/2009	12:12-12:28	0.3	Talking to and responding by email to Nicole re filing and service in the MDL & labs for pill testing.
5/7/2009	1:30-1:43	0.3	Respond to Fred's Emails re conduct of discovery and discovery extensions
5/7/2009	2:38-2:42	0.4	Researching plaintiffs steering committee letter
5/7/2009	3:13-3:32	0.4	Work on PSC Letter
5/7/2009	3:33-3:55	0.4	Help Marissa get documents served and sent out email to listserv on behalf of Fred
5/7/2009	5:51 – 6:08	0.5	Look over out of state subpoena information and talk to Lynn re Zicam
5/7/2009	6:08-6:33	0.5	Work on PSC letter and send email to Teresa about her part
5/7/2009	5:00-5:43	0.8	Talk to Don Ernst about Digitek Trial Worthy Case and emailed forms to him.
5/7/2009	3:55-5:00	1.1	
5/8/2009	9:15-9:17	0.1	Email Rhonda back
5/8/2009	10:28-10:33	0.1	Talked to Mary Ellen Morris about how to non-suit cases
5/8/2009	1:00-1:05	0.1	Sending email to PSC and responding to Rhonda Clement
5/8/2009	1:05-1:10	0.1	Figure out dates for discovery training
5/8/2009	1:10-1:15	0.1	Return email re PFS to Nicole at Beasley Allen
5/8/2009	1:17-1:20	0.1	Email David Wilharm re Time for Discovery training
5/8/2009	3:37-3:42	0.1	Email back Pete Albanus
5/8/2009	3:42-3:48	0.1	Email Defendants re call
5/8/2009	3:48-3:51	0.1	Email Nicole re MDL Question
5/8/2009	4:32-4:34	0.1	Email Carl re Conduct of Discovery Order
5/8/2009	4:34-4:35	0.1	Email back Pete Albanus
5/8/2009	4:44-4:46	0.1	Email Ericka re call on Monday.
5/8/2009	4:47-4:51	0.1	Get call list updated and printed out for Fred (those that haven't paid assessment & Paul Sizemore).
5/8/2009	4:51-4:54	0.1	Email back Shamus re PSC/MDL.
5/8/2009	4:55-4:56	0.1	Talked to Fred 19 th or 22 nd ok for Fred for Depositions
5/8/2009	9:17-9:25	0.2	Send out PSC Email re call reminders

5/8/2009	10:33-10:42	0.2	Filling in To-do list
5/8/2009	9:45- 10:03	0.3	Email recordtrak re deal for Plaintiffs
5/8/2009	2:30-2:53	0.4	Talk to Harry
5/8/2009	3:15-3:36	0.4	Figure out discovery schedule and call David back
5/8/2009	3:55-4:15	0.4	Talk to Matt Moriarty re issues
5/8/2009	10:03-10:28	0.5	Filling in To-do list
5/8/2009	10:47-11:20	0.6	Read over law on Count 1,2,3 from Bobby , respond to Digitek emails
5/8/2009	1:50-2:30	0.7	Law & Pleading Call
5/11/2009	9:59-10:04	0.1	Talk to David re Date for document training and status of discovery discs
5/11/2009	10:25-10:31	0.1	Respond to David's email and Harry's email re training
5/11/2009	10:40-10:42	0.1	Respond to David's email re documents
5/11/2009	1:04-1:08	0.1	Email Stacy Hauer
5/11/2009	1:35-1:41	0.1	Email Ericka re call this afternoon
5/11/2009	1:51-1:53	0.1	Respond to Camp Bailey's email re PSC Call
5/11/2009	1:55-1:58	0.1	Getting Ready for Call
5/11/2009	2:27-2:32	0.1	Talk to Stacy Hauer re 12(b)(6) motion
5/11/2009	2:32-2:37	0.1	Talk to Carmen re PSC call and talking to Dr. Nelson about the criteria sheet
5/11/2009	2:38-2:40	0.1	Talk to Marissa to schedule Call between Fred & Stacy re motion
5/11/2009	3:49-3:50	0.1	Email Tracy re PSC Call & document vendor
5/11/2009	4:33-4:34	0.1	Print out Crivella West contract
5/11/2009	4:46-4:51	0.1	Talk to Dr. Nelson
5/11/2009	5:27-5:31	0.1	Email Teresa re letter to court
5/11/2009	9:14-9:17	0.2	Listen to voicemail from Dr. Nelson and speak with Dr. Nelson
5/11/2009	9:24-9:33	0.2	Read Digitek Emails
5/11/2009	12:55-1:03	0.2	Respond to David's emails re document production format and meeting with Crivella West
5/11/2009	1:27-1:35	0.2	Work on agenda for PSC Call and email out to PSC listserv

5/11/2009	3:54-4:03	0.2	Talk to Ericka from SHB re non suit, Serving PFS, authorizations, and meeting about deadlines in PTO # 16.
5/11/2009	7:15-7:25	0.2	Email Michael Anderton & Defendants re extension
5/11/2009	3:35-3:48	0.3	Email Mike re MDL question on PFS
5/11/2009	4:10-4:30	0.4	Talk to Carl re Digitek MDL updates
5/11/2009	1:58-2:27	0.5	PSC Call
5/12/2009	9:25-9:30	0.1	Prepare for call.
5/12/2009	10:18-10:20	0.1	Read emails from Pete and Bobbie Blanchard re coding
5/12/2009	12:16-12:19	0.1	Email Rhonda re Service instructions and work on them
5/12/2009	12:28-12:30	0.1	Email Pete Miller re Coding Terms
5/12/2009	2:00-2:03	0.1	Email David and Rich re Crivella West
5/12/2009	3:27-3:32	0.1	Email lead re PFS & extensions
5/12/2009	3:33	0.1	Respond to email re PFS extension in MDL
5/12/2009	4:17-4:23	0.1	Talk to Debbie
5/12/2009	4:30-4:36	0.1	Email back Matt Moriarty
5/12/2009	5:38-5:40	0.1	Respond to Pat Avery's email.
5/12/2009	5:41-5:46	0.1	Email Rich Hood re availability on May 21 st .
5/12/2009	6:28-6:33	0.1	Email Mary Ellen Morris re dismissing case
5/12/2009	7:36-7:38	0.1	Respond to Holly's email re Ed taking Deposition
5/12/2009	10:41-10:50	0.2	Talk to Marissa about documents and go over Digitek MDL mail received
5/12/2009	10:50-11:00	0.2	Talk to Don Ernst re MDL and email fred re calling him
5/12/2009	5:30-5:38	0.2	Talk to Holly Gibson re Ed Blizzard and taking depositions
5/12/2009	7:39-7:47	0.2	Send email to co-leads re 30(b)(6) depositions.
5/12/2009	7:49-8:00	0.2	Respond to email re serving 1000+ pages of medical record w/ PFS.
5/12/2009	11:34-11:47	0.3	Email David Wilharm
5/12/2009	1:45-2:00	0.3	Working on Service Instructions Sheet
5/12/2009	2:03 -2:16	0.3	Respond to various MDL emails and Matt Moriarty
5/12/2009	3:35-3:48	0.3	Work on Coding form for Document Repository
5/12/2009	4:01-4:15	0.3	Talk to Shamus re MDL issues
5/12/2009	4:37-4:52	0.3	Talk to Shamus re PSC issues

5/12/2009	5:50-6:05	0.3	Talk to Jonathan Adams re listserv, documents and discovery in the MDL. Add him to the listserv and send out email with attachments
5/12/2009	6:15-6:28	0.3	Work on Coding for database
5/12/2009	9:30-9:49	0.4	Call w/ Crivella West & David
5/12/2009	11:13-11:34	0.4	Email back Camp Bailey & Thomas Bass re PFS and work on instructions
5/12/2009	11:47-12:16	0.5	Work on instructions sheet and email to Plaintiffs and Defendants separately.
5/12/2009	7:10-7:35	0.5	Research discovery & coding
5/12/2009	4:55-5:30	0.6	Emailing out to all counsel listserv instructions for serving PFS and responding to various emails re MDL issues including instructions for non suit to Mary Ellen Morris
5/12/2009	6:33-7:10	0.7	Work on Coding for database
5/12/2009	10:02-10:07	1	Sent out email to PSC listserv re coding information
5/13/2009	9:45-9:47	0.1	Leave Fred a message re Digitek
5/13/2009	11:11-11:15	0.1	Email back Matthew Block re PFS and deadlines.
5/13/2009	12:23-12:27	0.1	Digitek email and forward to Carmen with questions and question about getting together to do criteria sheet
5/13/2009	2:16-2:20	0.1	Email Back Crivella West
5/13/2009	2:25-2:29	0.1	Read over email from Harry Re Conduct of Discovery Order
5/13/2009	2:34-2:37	0.1	Respond to email re tolling agreement and PFS timeline
5/13/2009	4:05-4:11	0.1	Email from Rich, respond, and call Brooke at Harry's office to track down cover letters for discovery.
5/13/2009	4:11-4:15	0.1	Email Stacy Hauer re Motion to Dismiss
5/13/2009	4:16-4:21	0.1	Email Brooke re cover letters
5/13/2009	6:15-6:20	0.1	Looking over Digitek documents to add to coding list
5/13/2009	6:30-6:35	0.1	Look over cover letters and respond to Rich's email
5/13/2009	6:45-6:48	0.1	Email David Wilharm re issues with load file and update.
5/13/2009	6:48-6:54	0.1	Update coding sheet and email out to Pete, Bobbie and David.
5/13/2009	7:04-7:08	0.1	Send email to Crivella West re training.
5/13/2009	9:38-9:45	0.2	Talk to Rose about depositions and document training

5/13/2009	9:58-10:10	0.2	Going through Digitek Email and responding
5/13/2009	11:00-11:10	0.2	Talk to Rose about trip to Pittsburgh and look at flight schedule
5/13/2009	12:43-12:55	0.2	Email David re training and talk to Rose about what time to leave
5/13/2009	12:55-56	0.25	Email Rose & Marissa re call from Fred
5/13/2009	6:20-6:25	0.3	Look over list of things to do for response to Defendants email re meeting on Friday, send email to Ericka & Matt.
5/13/2009	7:15-7:30	0.3	Email Defendants and All Counsel Listserv re Serving Plaintiffs Fact Sheet
5/13/2009	3:41-4:05	0.4	Coding Chart
5/13/2009	4:23-5:30	1.2	Go over case criteria & coding sheet with Carmen and talk to Fred about MDL Issues (talk to Fred probably 30 mins)
5/14/2009	10:20-10:23	0.1	Respond to David's email re coding
5/14/2009	10:23-10:26	0.1	Email Pat Avery
5/14/2009	11:29-11:31	0.1	Talk to Marissa re meetings on Friday
5/14/2009	11:31-11:32	0.1	Send Email to Defendants re meeting times
5/14/2009	11:32-11:37	0.1	Talk to Ashley re PFS and Caraco
5/14/2009	11:38	0.1	Forward PFS to Defendants
5/14/2009	12:17-12:20	0.1	Go over Pete's additions to the coding document
5/14/2009	12:20-12:23	0.1	Talk to Marissa re Calling Denise
5/14/2009	12:23-12:27	0.1	Respond to Pete Miller's email re document coding
5/14/2009	11:10-11:29	0.4	Talk to Carl re MDL
5/14/2009	9:45-10:20	0.6	Looking for Digitek documents, called Denise etc
5/14/2009	2:35-4:15	3.1	Various Digitek issues. Emailing Shelly Sanford, David Wilharm, F.Pitre's secretary Niki, Rich hood, Debbie Ziegler, Various PSC issues, Recordtrak ladies etc, trying to get travel plans set
5/15/2009	12:00-12:33	0.1	Call w/ Defendants
5/15/2009	12:35-12:40	0.1	Digitek getting read for 2:00 call
5/15/2009	11:45-12:00	0.3	Co-lead Call
5/15/2009	2:00-2:27	0.5	Law & Pleading Call
5/15/2009	9:00-11:30	2.5	Get ready for todays calls, 9:20-9:32 talk to Carl w/ Fred

5/15/2009	2:45-6:45	4	Email listserv, email defendants re extension, talk to Don Ernst re filing case, Talk to Pete Albanus re severance
5/16/2009	2:35-2:52	0.3	Read emails and talk to Debbie Zeigler
5/17/2009	6:00-6:45	0.8	Respond to various Digitek emails
5/18/2009	10:30-10:36	0.1	Talk to David re deposition
5/18/2009	1:40-1:45	0.1	Talk to Fred re documents
5/18/2009	9:22-9:30	0.2	Talk to David re Deposition
5/18/2009	10:20-10:30	0.2	Document Review for Deposition
5/18/2009	12:20-12:29	0.2	Talk to David re motions responses
5/18/2009	1:30-1:40	0.2	Talk to Carl
5/18/2009	8:30-8:43	0.3	Email to Harry re PSC name for ECF & Email to IT re PSC website & Calendar
5/18/2009	10:12-10:20	0.3	Talk to Fred re Deposition Documents & Deposition
5/18/2009	1:00-1:30	0.5	Call with Defendants
5/18/2009	8:43-9:22	0.7	Documents for Deposition
5/18/2009	9:30-10:12	0.7	Document Review for Deposition
5/18/2009	10:37-12:20	1.8	Document Review for Deposition
5/18/2009	7:10-9:05	2	Digitek prepare for deposition
5/18/2009	1:45-4:55	3.2	Digitek doc review etc
5/19/2009	1:30-2:30	1	Talking to David/Rose/Marissa etc re Digitek, forwarding documents to Marissa to print for Deposition, looking over 30(b)(6) responses and discussing.
5/19/2009	5:45-8:15	2.5	Work on 30(b)(6) motions
5/19/2009	10:00-1:00	3	Talk to Crivella West people and have training session
5/19/2009	2:30-6:00	3.5	Travel to NYC
5/19/2009	10:00-1:50	3.9	Work on 30(b)(6) motions, prepare for deposition
5/19/2009	4:40-10:00	5.4	Travel to Pittsburgh
5/20/2009	3:45-5:00	1.3	Digitek Emails
5/20/2009	9:45-12:00	2.3	Prepare for Deposition
5/20/2009	6:00-9:00	3	Prepare for deposition
5/20/2009	9:00-3:45	6.8	Deposition

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Digitek MDL Time

5/21/2009	8:00-8:15	0.8	Getting IT email together and sending around to leads and to Defendants
5/21/2009	6:45-9:00	2.3	Prepare for deposition
5/21/2009	9:00-2:00	5	Deposition
5/21/2009	2:00-7:00	5	Travel back to Charleston, SC
5/22/2009	10:40-10:47	0.2	Talk to David re IT call and send out email to Defendants
5/22/2009	10:18-10:40	0.4	Talk to Irene Renello re Depositions
5/22/2009	9:30-9:51	0.6	Digitek returning calls, emails etc re MDL, talking to David re IT call
5/22/2009	11:15-12:15	1	Digitek emails etc
5/22/2009	4:26-5:40	1.3	Talk to Fred re court reporters, Call Golkow etc
5/25/2009	1:30-1:40	0.2	Respond to various Digitek emails
5/26/2009	2:25-2:30	0.1	Respond to Defendants re setting up document call
5/26/2009	1:40-1:47	0.2	Digitek – reading emails
5/26/2009	11:00-11:14	0.3	Looking over documents
5/26/2009	9:04-9:36	0.4	Deposition Preparation
5/26/2009	8:00-8:30	0.5	Set up computer, work on time-sheet
5/26/2009	1:47-2:15	0.5	Deposition Prep
5/26/2009	8:30-9:03	0.6	Catch up on Digitek Emails – re listserv questions
5/26/2009	12:20-12:52	0.6	Talk to Fred re Travel Plans, Deposition Prep etc
5/26/2009	2:38-3:15	0.7	Deposition Prep
5/26/2009	3:30-5:35	2.1	Deposition Prep
5/26/2009	9:50-12:02	2.2	Talk to Fred; Deposition Prep, email lead, respond to other emails etc.; Talk to Harry
5/26/2009	5:41-8:15	2.6	Deposition Prep/ Document Review
5/27/2009	10:53-10:58	0.1	Talk to David
5/27/2009	7:55-8:09	0.3	Reviewing Docs for deposition
5/27/2009	10:35-10:53	0.3	Reviewing Docs for deposition
5/27/2009	11:00	1	Call w/ Defendants
5/27/2009	1:25	1.5	Reviewing Docs for deposition
5/27/2009	8:15-10:15	2	Reviewing Docs for deposition
5/27/2009	2:15-5:35	3.4	Get ready for Deposition

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Digitek MDL Time

5/27/2009	10:00-2:15am	4.3	Get ready for deposition
5/27/2009	5:35-10:00	4.5	Travel
5/28/2009	6:00-8:45	2.8	Prepare for deposition
5/28/2009	8:45-4:20	7.6	At deposition
5/29/2009	3:15-7:00	3.8	Digitek catch up
5/29/2009	9:00-2:30	5.5	Travel
6/1/2009	10:41-10:42	0.1	Call Carl
6/1/2009	2:54-3:01	0.1	Talk to Gail re video teleconferencing & send email to lead re video teleconferencing
6/1/2009	4:30-4:35	0.1	Respond to emails
6/1/2009	5:40-5:45	0.1	Print out Westin information
6/1/2009	11:04-11:15	0.2	Listen to message & Call Carl back
6/1/2009	1:35-1:47	0.2	Read emails & talk to Harry
6/1/2009	3:20-3:27	0.2	Talk to Pat Avery and send email re discovery deadlines to her
6/1/2009	2:01-2:15	0.3	Digitek
6/1/2009	3:05-3:20	0.3	Talk to Carl re Digitek
6/1/2009	10:43-11:03	0.4	Talk to Westin in Houston
6/1/2009	5:45-6:10	0.5	Meet with Alex Lewis re project
6/1/2009	3:30-4:20	0.9	Talk to Fred re Digitek w/ Rose, Marissa and Alex
6/1/2009	9:40-10:35	1	Listen to Digitek Messages, look up Westin for Houston
6/1/2009	12:00-1:02	1.1	Digitek Emails organization etc
6/1/2009	6:10-7:42	1.6	Respond to listserv email & sending out status conference update, looking over Westin Contract & information, respond to Michael Anderton's email, respond to Matt Moriarty's email and email co-lead.
6/2/2009	10:38-10:45	0.2	Call Fred and talk about Gibraltar subpoena and various issues
6/2/2009	8:30-8:45	0.3	Reading Digitek Emails
6/2/2009	12:00-12:15	0.3	Talk to Carl
6/2/2009	9:45-10:15	0.5	Call Matt Moriarty (leave a message), try calling Carl, talk to Rose about PFS, go through PFS spreadsheet, talk to Marissa about Friday meeting

6/2/2009	12:15-1:00	0.8	Talk to Daniel Prince from Gibraltar, Send email to David Wilharm re Crivella West & research on subpoenas, send email to PSC re Houston meeting, send email to Fred re talking to Matt.
6/2/2009	10:45-12:00	1.3	Going through documents, organizing, looking at Resumes
6/2/2009	1:25-2:44	1.4	Following up on e-discovery email, reading email from Crivella West
6/2/2009	2:55-5:45	3.4	Talk to David, email Rose & Brook, read letter from Defendants
6/3/2009	1:50-1:55	0.1	Prepare for Defense Call
6/3/2009	12:45-1:00	0.3	Get Ready for co-lead call
6/3/2009	2:00-2:30	0.5	Call w/ Co-lead & Defendants
6/3/2009	1:00-1:50	0.9	Co-lead Call
6/3/2009	9:45-12:00	2.5	Digitek, call w/ Crivella west, Call w/ David, talk to Fred
6/3/2009	2:30-6:30	4	Digitek, filling out & faxing Westin Contract, sending emails re Westin contract, talk to Harry re call w/ Defendants, Talk to Alex & Fred re research project, update listserv, Talk to Brook and Rose re Crivella West & PFS
6/4/2009	9:45-9:48	0.1	Talk to Harry re Gibraltar
6/4/2009	9:48-10:05	0.3	Talk to Pete Miller re Binders for Meeting
6/4/2009	10:25-6:35	8.2	Digitek, drafting letter to Court re Severance and re Defendants letter re PFS, editing letter, sending out, talking with Co-leads about the letter, Talk to Alex about the motion.
6/5/2009	12:55-1:01	0.1	Emailing PFS spreadsheets
6/5/2009	2:23-2:28	0.1	Talk to Ruth Ann re Westin conference needs
6/5/2009	2:28-2:30	0.1	Email Vince & Gary documents
6/5/2009	3:00-3:05	0.1	Talk to from Girardi to add James O-Callahan to listserv.
6/5/2009	9:25-9:35	0.2	Reading Digitek emails
6/5/2009	9:50-10:00	0.2	Prepare for Call
6/5/2009	1:58-2:05	0.2	Talk to Alex
6/5/2009	2:15-2:23	0.2	Talk to David Wilharm re CW
6/5/2009	9:35-9:50	0.3	Talk to David re CW Kiosk
6/5/2009	1:05-1:20	0.3	Talk to Pete Miller

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Digitek MDL Time

6/5/2009	2:30-3:00	0.5	Working on response to motion to quash and cross-motion to expand scope of discovery
6/5/2009	11:30-12:10	0.7	Working on response to motion to quash and cross-motion to expand scope of discovery
6/5/2009	12:10-12:55	0.8	Talk to Don Ernst re case
6/5/2009	10:00-11:30	1.5	Crivella West
6/5/2009	3:05-6:00	3	Talk to Fred, Alex, Rose & Marissa re Digitek; send out emails re motion to quash, read over motion etc
6/7/2009	1:45-3:15	5.8	Reading over depositions & documents, sending out email re projector.
6/8/2009	10:00-10:18	0.3	Crivella West Call
6/8/2009	10:18-10:35	0.3	Digitek
6/8/2009	12:45-1:38	0.9	Digitek – emailing to listserv
6/8/2009	8:50-10:00	1.2	Work on discovery, send out email to listserv for discovery requests, talk to David re Crivella West & Discovery,
6/8/2009	11:20-12:45	1.5	Digitek- working on discovery and response to motion to quash
6/8/2009	9:20-12:00	2.7	Digitek- working on discovery and response to motion to quash
6/8/2009	2:36-8:33	6	Digitek- working on discovery and response to motion to quash
6/9/2009	1:45am-2:35am	0.9	Review Discovery Responses
6/9/2009	12:00-1:03am	1.1	Working on Response to Motion to Quash & Discovery requests
6/9/2009	8:20-1:20	5	Digitek
6/9/2009	1:37-9:00pm	7.4	Digitek
6/10/2009	9:30-1:00	3.5	At office – getting ready for PSC meeting
6/10/2009	7:15-10:45	3.5	Dinner w/ PSC
6/10/2009	1:00-6:45	5.8	Travel to Houston
6/11/2009	4:00-10:45	6.8	Travel
6/11/2009	7:00-3:00	8	PSC Meeting
6/12/2009	1:30-2:30	1	Prepare for Call
6/12/2009	2:30-3:30	1	Call w/ Defendants
6/12/2009	3:30-5:00	1.5	Talk to Fred re deadlines & to-do list, send out emails to various people & PSC re Digitek

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Digitek MDL Time

6/12/2009	9:30-12:30	3	
6/15/2009	9:30-12:00	2.5	Digitek – Going through PFS, Various emails etc
6/15/2009	12:00-6:15	6.3	Digitek – Going through PFS, Various emails etc
6/16/2009	4:00-5:15	1.3	At Harry's Office
6/16/2009	9:15-11:00	1.8	Going through PFS & time chart
6/16/2009	7:00-9:15	2.3	Dinner w/ Carl & Fred
6/16/2009	9:15-11:45	2.5	Preparing for Status Conference
6/16/2009	11:45-3:45	4	Travel to Charleston, WV
6/17/2009	10:45-11:00	0.3	Plaintiffs Meeting w/ Judge
6/17/2009	11:00-12:00	1	Meeting w/ WV state guys
6/17/2009	7:30-9:00	1.5	Prepare for hearing
6/17/2009	9:00-10:45	1.8	Status Conference
6/17/2009	5:00-7:30am	2.5	Going through PFS & time chart
6/17/2009	12:00-6:00	6	Travel
6/18/2009	1:45-2:00	0.3	
6/18/2009	3:00-3:30	0.5	Call w/ NJ Guys
6/18/2009	2:00-2:51	0.9	Science & Expert Call
6/18/2009	3:30-6:00	2.5	
6/18/2009	9:55-12:45	2.9	
6/19/2009	10:25-10:35	0.2	Email responses
6/19/2009	11:35-11:45	0.2	Talk to Marissa about upcoming deadlines
6/19/2009	11:00-11:15	0.3	Digitek Discovery Chart
6/19/2009	10:00-10:25	0.5	Call w/ Crivella West
6/19/2009	11:45-12:20	0.6	
6/19/2009	9:15-10:00	0.8	Go through discovery emails, look at kiosk, talk to David Wilharm re kiosk
6/19/2009	1:25-2:38	1.3	Email David re motion and work on doc reviewer chart
6/19/2009	3:00-5:05	2.1	MDL
6/22/2009	9:35-9:40	0.1	Talk to Fred re deposition date
6/22/2009	9:20-9:35	0.3	Look over Digitek mail & letters

6/22/2009	5:00-5:20	0.4	email Crivella West, email lead, Pete & mike re Delicato's deposition.
6/22/2009	12:15-12:45	0.5	email Angie, email Crivella West, email Defendants re Delicato's deposition
6/22/2009	8:30-9:18	0.9	updated Plaintiffs listserv email list.
6/23/2009	4:37-5:30	0.9	Digitek – Meet w/ Fred re Defendants Letter, Talk to MDL Counsel
6/23/2009	9:45-11:15	1.5	Responding to emails, typing up update to listserv w/ Status Conf. minutes, Discuss w/ Fred (who looked over minutes, Discuss to-do list w/Fred (11:40-12:00); Add new Plaintiffs to the listserv, send out email to lead re scheduling Trial Selection
6/23/2009	2:10-4:30	2.4	Respond to emails, meet w/ Alex on Response, Talk to David Wilharm re documents
6/23/2009	6:35-9:36	3.4	Digitek – organize documents etc.
6/24/2009	8:35-8:40	0.1	Digitek Emails
6/24/2009	2:48-2:53	0.1	Talk to David
6/24/2009	1:50-2:00	0.2	Talk to David
6/24/2009	2:53-3:05	0.2	Talk to Pete
6/24/2009	1:35-1:50	0.3	Go over docs and response / prepare for training
6/24/2009	3:05-3:19	0.3	Digitek – send email to Crivella West re Pete's password,
6/24/2009	1:15-1:35	0.4	Talk to Alex re response and FDA Docs
6/24/2009	12:45-1:15	0.5	Go over docs with Fred
6/24/2009	2:00-2:48	0.9	Crivella West Training
6/24/2009	9:10-10:40	1.5	Digitek, send out email, working on document reviewer list,
6/24/2009	11:04-12:45	1.7	Send out emails re Digitek, email document reviewers, go over FDA 483's
6/24/2009	10:40-11:03	2.5	Talk to Alex re response
6/24/2009	4:21-8:50	4.5	Digitek
6/25/2009	8:30-8:45	0.3	Work on Reply to Def. Response to Cross-Motion; email, class action chart update;
6/25/2009	11:30-12:00	0.5	Work on Reply to Def. Response to Cross-Motion
6/25/2009	10:23-1:20	3	Work on Reply to Def. Response to Cross-Motion

6/25/2009	6:40-10:30	3.9	Work on Reply to Def. Response to Cross-Motion
6/25/2009	2:00-6:00	4	Work on Reply to Def. Response to Cross-Motion
6/26/2009	6:35-6:40	0.25	Set up Computer
6/26/2009	12:00-12:45	0.8	Work on Reply to Def. Response to Cross-Motion
6/26/2009	9:28-10:52	1.4	Work on Reply to Def. Response to Cross-Motion
6/26/2009	6:40-9:03	2.4	Work on Reply to Def. Response to Cross-Motion
6/26/2009	11:05am-10:39pm	11.6	Work on Reply to Def. Response to Cross-Motion
6/29/2009	8:53-8:55	0.1	Send email to Crivella West
6/29/2009	2:00-2:17	0.3	Listen to Digitek Voicemail
6/29/2009	10:20-10:52	0.6	Talk to Alex re motion getting filed. Talk to David re Choice of law motion, training schedule, document loading, custodial names.
6/29/2009	10:52-11:40	0.9	Go through Digitek Bills, distribute to Michelle, Talk to Rose about MDL file, Talk to Fred (20 min) re reply, etc.
6/29/2009	2:17-4:50	2.6	Go through email, PSC Trial Selection Meeting
6/30/2009	5:30-5:34	0.1	Call Fred re tolling agreement PFS due date and email back Laurence
6/30/2009	5:38-5:41	0.1	Call Fred and email defendants re documents for reply to Defendants response.
6/30/2009	4:02-4:10	0.2	Schedule conference room, talk to Fred re deadline and forward to David.
6/30/2009	10:35-10:55	0.4	Prepare for call
6/30/2009	1:05-1:35	0.5	Look up Status Conf. notes to see what Stanley said re cases & motion schedule
6/30/2009	10:55-11:30	0.6	Lead Digitek document review
6/30/2009	9:00-10:20	1.4	Prepare for training, etc
7/1/2009	11:30-11:36	0.1	Talk to Rose, respond to staci's email, respond to Shelly's email
7/1/2009	10:20-10:30	0.2	Digitek, Talk to Carl and respond to email
7/1/2009	10:53-11:00	0.2	Talk to Rose, Respond to Debs email
7/1/2009	2:08-2:20	0.2	Email regarding Mylan/UDL priv. log etc
7/1/2009	7:00-7:10	0.2	Digitek emails
7/1/2009	9:30-9:55	0.5	Catch up on Digitek emails, emailing out about document review etc.

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Digitek MDL Time

7/1/2009	11:56-12:30	0.6	Digitek emails and prepare for call
7/1/2009	4:28-5:23	1	Talk to Fred, David & Carl re Orders
7/1/2009	3:15-4:20	1.1	Meeting w/ Shelly Sanford & Jim W.
7/1/2009	5:33-6:40	1.2	Digitek, catching up on email responses, scheduling meeting for document review, updating chart
7/2/2009	4:25-4:30	0.1	Talk to Dave Peterson re MDL message
7/2/2009	4:15-4:24	0.2	Talk to Marissa re MDL message,
7/2/2009	9:45-10:00	0.3	Talking to Fred & Carl re orders etc
7/2/2009	10:30-10:50	0.4	Read over Draft Motion on former employees and talk to David about it
7/2/2009	9:15-9:45	0.5	Talk to David re Document Training, Sending Various emails
7/2/2009	10:00-10:30	0.5	Document review training then talk to David afterwards
7/2/2009	10:50-11:15	0.5	Go over various Digitek issues with Fred including RFA etc.
7/2/2009	12:30-1:35	1.1	Email out re class deposition cancelled, email out new tolling agreement PFS deadline,
7/2/2009	4:30-6:00	1.5	Digitek stuff, emails etc
7/2/2009	1:50-4:10	2.5	Email out about trial selection, draft and email out objections to RFA
7/5/2009	4:20-4:30	0.2	Digitek emails
7/5/2009	5:55-6:02	0.2	Digitek Motion for exparte contact w/ former employee
7/5/2009	6:07-8:05	2	Digitek Motion for exparte contact w/ former employee
7/6/2009	10:50-11:15	0.5	
7/6/2009	8:00-10:45	2.8	Digitek, finishing motion for ex parte contact and master objections, talking to Dave etc
7/6/2009	9:15-10:00	0.3	Digitek – work w/ David on ex parte
7/8/2009	7:26-7:33	0.2	Talk to Harry re MDL meeting etc
7/8/2009	2:00-2:30	0.5	Doc review training session
7/8/2009	5:15-5:50	0.6	Meeting w/ Fred
7/8/2009	12:50-2:00	1.1	Prepare for training session and talk to Fred re Extension for Mylan discovery
7/8/2009	5:50-7:20	1.5	Work on Trial Criteria Sheet, send out notice to PSC

7/8/2009	9:30-12:15	2.8	Work on doc reviewer chart, send out passwords, go through files and organize Digitek stuff, schedule class discovery, email reminder on meeting
7/8/2009	2:30-5:15	2.8	Work on setting up meeting in Philly, work on trial selection criteria and chart, look through PFS, email pete re document coding session
7/9/2009	2:17-2:25	0.2	Work on MDL to-do list, talk to Carl re Digitek Trial Selection
7/9/2009	2:40-2:52	0.2	Digitek Master to do list, Call Robert Becnel's office for depo prep sheet
7/9/2009	11:00-11:30	0.9	Digitek – MDL
7/9/2009	2:59-6:00	3.1	Digitek, email re trial selection
7/10/2009	4:00-4:30	0.5	Talk to Fred and work on letter re pill testing, get letter to defendants
7/10/2009	1:30-2:15	0.8	Work on letter re pill testing to send to defendants
7/10/2009	9:30-11:00	1.5	Digitek emails, figure out who's coming to trial selection committee, send out emails
7/13/2009	10:10-11:00	0.9	Work on Trial Selection
7/13/2009	11:40-1:00	1.4	Work on Trial Selection
7/13/2009	2:00-8:30	6.5	Work on Trial Selection
7/14/2009	8:45-10:15	1.5	Working on trial selection and finishing and filing reply for ex parte motion
7/14/2009	9:30-11:30	2	Working on trial selection and finishing and filing reply for ex parte motion
7/14/2009	10:15-2:30	4.3	Travel
7/14/2009	2:30-7:00	4.5	Working on trial selection and finishing and filing reply for ex parte motion
7/15/2009	6:00-8:15	2.3	Work on Trial Selection Information
7/15/2009	5:30-11:30	6	Travel
7/15/2009	8:30-3:30	7	Trial Selection Meeting
7/16/2009	4:30-4:35	0.1	Look over PTO # 16 and send out email to Lead.
7/16/2009	4:15-4:30	0.3	Talk to Fred
7/16/2009	4:50-5:05	0.3	Talk to Carl re PTO # 16
7/16/2009	3:55-4:15	0.4	Talk to David

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Digitek MDL Time

7/16/2009	5:45-6:30	0.75	Email Defense re PTO # 16 and medical authorizations.
7/16/2009	2:10-3:00	0.9	MDL - work
7/16/2009	8:30-12:00	3.5	Type up list of Defendant's trial cases, email out to listserv, listen in on first class rep deposition (while working on other MDL things), answer emails etc -
7/17/2009	8:45-8:55	0.2	Digitek, send out probate/PR orders to listserv
7/17/2009	9:21-10:00	0.7	Send motion to Roger, go through email etc.
7/20/2009	4:10-4:15	0.1	Talked to Dave Wilharm
7/20/2009	3:56-4:03	0.2	Talked to Pat Avery
7/20/2009	4:03-4:10	0.2	Digitek
7/20/2009	2:33-2:50	0.3	Digitek
7/20/2009	4:15-4:30	0.3	Digitek
7/20/2009	12:50-1:13	0.4	Digitek
7/20/2009	4:30-4:50	0.4	Talked to Dave Wilharm
7/20/2009	2:00-2:33	0.6	Call w/ Pltfs Counsel w/ case picked by Defense
7/20/2009	2:50-3:56	1.1	Digitek
7/20/2009	10:00-12:10	2.2	Digitek
7/20/2009	4:50-7:03	2.3	Work on Summaries for Court
7/21/2009	9:30-10:00	0.5	Call w/ Plaintiffs attorneys
7/21/2009	8:45-9:30	0.8	Finish up summaries for Court,
7/21/2009	9:30-11:00	1.5	Prepare for hearing
7/21/2009	10:00-12:30	2.5	Add summaries to letter for court , Work on Trial Selection Hearing Binders etc
7/21/2009	1:30-4:00	2.5	Work on Trial Selection Hearing binders etc
7/21/2009	4:00-8:00	4	Travel to West Virginia
7/22/2009	5:00-6:30am	1.5	Print materials for hearing
7/22/2009	6:30-9:00	2.5	Meet w/ Fred & Carl, prepare for hearing
7/22/2009	9:00-11:50	2.9	Trial Selection Hearing
7/22/2009	12:45-6:00	5.3	Travel from WVa back to SC
7/23/2009	10:55-11:00	0.1	go over Stanley's latest PTO
7/23/2009	11:00	0.1	Talk to Fred

7/23/2009	11:16-11:23	0.2	Talk to David Wilharm re order
7/23/2009	1:55-2:05	0.2	Talk to Jim Capretz (Gilmore Case), Holly Gibson (Kelch Case) and Fred
7/23/2009	11:00-11:16	0.3	Work on update to listserv
7/23/2009	2:10-2:30	0.4	Prepare for afternoon calls.
7/23/2009	2:55-3:14	0.4	Talk to Dave
7/23/2009	12:43-1:10	0.5	Digitek
7/23/2009	2:30-2:55	0.5	Call w/ Crivella West
7/23/2009	5:30-6:20	0.9	working on response to Defendants re Response to our letter on Pill Testing, Called Don Ernst re trial case, left message for Matt M on releases
7/23/2009	11:40-12:40	1	update listserv, rework update to listserv on hearing
7/24/2009	5:30-6:30	1	work on letter re depositions and pill testing letter
7/24/2009	10:00-12:14	2.3	work on letter re depositions and pill testing letter
7/27/2009	5:00-6:30	1.5	alk to Rhonda re FOIA docs / download and lookover Pete's spreadsheet re documents
7/28/2009	3:00-3:05	0.1	Email Sandy & recordtrack re Linen's records
7/28/2009	3:15-3:18	0.1	Email Mary at Crivella West
7/28/2009	3:18-3:24	0.1	Email Terry Gomez re Vega Trial Case
7/28/2009	3:46-3:49	0.1	Emailing back Unke law about service of process
7/28/2009	11:50-12:00	0.2	Digitek Organization
7/28/2009	12:45-12:55	0.2	Talk to Fred re Digitek MDL repository and PTO # 32
7/28/2009	1:12-1:20	0.2	Talk to Terry from Sanford Barlow
7/28/2009	8:15-8:30	0.3	Email re Class Action Deposition Today
7/28/2009	11:10-11:50	0.7	Go over MDL organization with Sandy
7/28/2009	10:00- 10:45	0.8	Digitek emails, Talk to Irene Renello re deposition repository and billing, Talk to lady from Unke law re fact sheet,
7/28/2009	6:45-7:50	1.1	Respond to question re filing complaint and legal research
7/28/2009	3:50-6:25	2.6	Reading response and conducting legal research
7/29/2009	2:45-3:00	0.3	Send email to Harry/Lead re defendants disc., email back re MDL,

7/29/2009	9:40-11:50	2.2	Add/Subtract from listserv, read Mylan article, Rule 11 research, talk to David about motion and document review so far.
7/29/2009	3:45-7:46	4.1	talk to David re response to RFA objections, look over D's objections to PTO # 27, look up rule & email Dave about it, work on attorney list
7/29/2009	0.2	0.2	email back re MDL
7/30/2009	1:20-1:28	0.2	Talk to Fred re response and emailing listserv.
7/30/2009	9:30-10:10	0.7	Read cases for Rule 11 response/RFA objections
7/30/2009	6:29-7:09	0.7	Work on PTO # 12 and Crivella West stuff.
7/30/2009	2:42-3:45	1.1	Digitek, catching up etc
7/30/2009	4:24-6:06	1.7	Go over various issues w/ Fred including order regarding production of medical records, amendments to PTO # 16, Defendants objections to PTO # 27. Filed our response in opposition to Defendants motion re our objections.
7/30/2009	10:15-12:25	2.2	Work on response and talk to Fred about it
7/31/2009	5:15-5:20	0.1	Digitek- getting documents in order
7/31/2009	11:25-12:05	0.7	Send out update to lead re things that need to be accomplished, email Renillo about deposition billing etc.
7/31/2009	1:10-1:55	0.8	Email Def. re PTO # 16 revisions, serve discovery on Defendants
7/31/2009	2:35-3:50	1.3	Going over Trial Cases, check on Crivella West to see if upadated
7/31/2009	9:40-11:00	1.4	Go over things to be done, Re-read PTO # 16 to make sure it is ok. Talk to Sandy re PTO # 12, drafting letter to Ericka, talked to Fred about objections
8/3/2009	11:09-11:11	0.1	Talk to Marissa re Fred's schedule
8/3/2009	2:35-2:41	0.1	Look over med panel article and send to lead
8/3/2009	9:40-9:50	0.2	Digitek, sending Matt's email on medical records PTO
8/3/2009	10:20-10:27	0.2	Go over Digitek stuff received in mail
8/3/2009	11:11-11:21	0.2	Talk to Carl re meeting & cases
8/3/2009	12:35-12:42	0.2	Read over Pat Avery's email.
8/3/2009	1:45-1:55	0.2	Talk to Jennifer Lenze re Pill testing etc
8/3/2009	11:53-12:05	0.3	Read PTO # 33

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Digitek MDL Time

8/3/2009	12:05-12:18	0.3	Talk to Fred re Digitek
8/3/2009	1:55-2:10	0.3	Go over response sent in by Adam, double check Matt's motion & order and respond to email
8/3/2009	3:17-5:10	1.9	Digitek – coordinate call tomorrow, look over pleadings for response to objections
8/3/2009	5:24-6:14	1.9	Look over pleadings for response to objections
8/4/2009	12:02-12:28	0.5	Digitek, email Defendants, email matt etc
8/4/2009	1:45-6:00	2.5	Digitek MDL, respond to emails etc and get Fred to Call Matt
8/4/2009	9:00-11:34	2.6	Prepare for call with Judge Stanley, Call Fred to make sure he's up (he was in Vegas), call w/ Stanley (9:50-),
8/5/2009	2:30-4:10	1.7	
8/5/2009	9:30-12:55	3.5	
8/5/2009	4:18-9:20	5.1	Digitek MDL
8/6/2009	5:15-6:00	0.8	Digitek emails
8/6/2009	10:30-4:00	5.5	Work on Digitek response to Defendants objections to PTO # 27, call w/ Statistics expert
8/7/2009	8:30-11:00	3	Digitek, trial counsel call, emails etc
8/10/2009	11:00-12:30	1.5	Prepare for status conf. and hearing
8/10/2009	2:25-4:40	2.3	Prepare for status conf. and hearing
8/10/2009	9:30-1:15	3.8	Digitek MDL
8/10/2009	4:40-10:45	6.1	Travel to W.Va.
8/11/2009	6:00-7:00	1	Prepare for status conf. and hearing
8/11/2009	7:00-8:45	1.8	Meet w/ Carl re status conf. and hearing
8/11/2009	8:45-11:14	2.5	Status Conf and Hearing
8/11/2009	11:15-6:40	7	Travel back to SC
8/12/2009	2:00-4:30	2.5	Respond to Digitek emails (re listserv, master complaint and class action issues).
8/13/2009	4:40-4:50	0.2	Digitek – emails to defendants and looking over
8/13/2009	2:45-3:15	0.5	Digitek emails and calls. Calling Clerks office re transcripts and emailing Jim
8/13/2009	6:02-8:14	2.2	Digitek – work on access spreadsheet and PTO # 12's

8/13/2009	9:30-12:30	3	Digitek MDL
8/14/2009	9:30-10:40	1.2	Digitek MDL email Crivella west etc re access
8/16/2009	5:30-8:52	3.4	Digitek MDL – try and catch up before going on trip
8/17/2009	11:30-11:47	0.3	Email w/ MDL counsel re medicare
8/17/2009	2:23-5:15	2.9	Digitek MDL
8/17/2009	5:20-8:48	3.5	Digitek MDL – Work on Defendant deposition Chart, and letter to defendants re depositions, correspond with Matt Moriarty re time for meeting
8/17/2009	9:30-2:20	4.9	Digitek MDL
8/18/2009	8:55-8:57	0.1	Read and Send Digitek Emails in MDL
8/18/2009	11:48-11:53	0.1	Talk to Matt Moriarty re issues that need to be discussed and when he's available to discuss with Fred.
8/18/2009	11:53-11:55	0.1	Respond to MDL Counsel re listserv and document repository
8/18/2009	11:57-11:58	0.1	Leave Dave Wilharm message re documents received
8/18/2009	5:07-5:10	0.1	Email Co-leads re Requests to withdrawal as Counsel from MDL
8/18/2009	5:20-5:25	0.1	MDL – email catch up.
8/18/2009	5:25-5:31	0.1	Talk to Matt Moriarty
8/18/2009	12:05-12:21	0.3	Go over ltr w/ Defendants depositions w/ Fred
8/18/2009	1:13-1:30	0.3	Digitek, email mdl, email co-leads, send letter to fred to sign etc and then mail to Matt.
8/18/2009	3:55-4:10	0.3	Take Transcripts to Sandy and ask Fred about Texas Plaintiffs and sharing depositions
8/18/2009	5:31-5:47	0.3	Talk to Larry Charfoos re medicare/Medicaid issues with settlement in MDL
8/18/2009	4:25-4:50	0.5	Talk to Mitch re FOIA docs and what we are looking for.
8/18/2009	12:21-12:55	0.6	Work on letter to Defendants re depositions, Talk to Dave and leave Debbie message
8/18/2009	2:40-3:15	0.6	Go over FDA FOIA documents and assignment with Mitch, talk to Matt about Texas docs, listen to Debbie message.
8/18/2009	9:00-9:35	0.6	Go back over Digitek emails and to-do list.

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Digitek MDL Time

8/18/2009	10:50-11:30	0.7	Meet w/ Sandy re Digitek documents and organizing in MDL (went over Crivella West, spreadsheets etc)
8/18/2009	1:30-2:15	0.8	Talk to Matt & Fred
8/19/2009	11:30-11:34	0.1	Digitek – email Matt
8/19/2009	12:24-12:30	0.1	Get list from Mitch and look over it
8/19/2009	12:38-12:44	0.1	Talk to Fred re call today w/ Defendants
8/19/2009	3:10-3:55	0.1	Call w/ Def
8/19/2009	1:37-1:45	0.2	Digitek MDL
8/19/2009	10:21-10:30	0.2	Follow up on MDL emails and msgs
8/19/2009	3:55-4:11	0.3	Talk to Marissa & Fred
8/19/2009	11:40-12:04	0.4	Digitek, talk to David, Email Carl and email letter to defendants
8/19/2009	2:14-3:10	0.9	Go over FOIA docs and talk to Fred and Carl
8/19/2009	8:32 -9:37	1.1	Email out usernames and passwords for Crivella West
8/19/2009	6:00-8:25	2.5	Email MDL questions, send email to Dave
8/20/2009	10:51-10:56	0.1	Emailing Larry & Sandy re crivella west passwords
8/20/2009	10:56-11:01	0.1	Email Lead re motions to withdraw
8/20/2009	8:44-8:51	0.2	Email Jerry Hafter re Digitek
8/20/2009	1:25-1:36	0.2	Email Pete
8/20/2009	1:00-1:25	0.5	Talk to Carl (on blackberry from airport)
8/21/2009	10:25-10:30	0.1	Read and respond to Jim Pettit's email
8/21/2009	2:45-2:59	0.3	Email and talk to Sandy
8/21/2009	9:00-10:00	1	Talk to Marissa and email from NYC hotel
8/28/2009	11:45-12:15	0.5	Check Digitek email and email Sandy re handling
8/31/2009	10:18-12:47	2.5	Digitek
8/31/2009	2:10-6:45	4.6	Digitek
9/2/2009	11:15-11:21	0.1	Talk w/ Nick Clevenger re service issues and RFA
9/2/2009	9:30-9:40	0.2	Email
9/2/2009	11:25-11:32	0.2	Talk to Dave Wilharm re things to do and emailing Alan re production issues.
9/2/2009	3:10-3:20	0.2	Work on MDL to-do list.
9/2/2009	3:35-3:51	0.3	Look up expert Fred emailed about.

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Digitek MDL Time

9/2/2009	9:42-10:12	0.5	Email re RFA
9/2/2009	1:15-1:40	0.5	
9/2/2009	10:14-10:57	0.8	Email, set up PSC Call (email PSC)
9/2/2009	11:32-12:15	0.8	Work on Master to-do list.
9/2/2009	4:25- 7:08	2.8	Update Access Chart and email Crivella West, email Shamus,
9/3/2009	2:50-2:59	0.2	Call w/ Trial Cases
9/3/2009	3:00-3:10	0.2	Call w/ co-leads & Shamus
9/3/2009	9:15-9:38	0.4	Email etc,
9/3/2009	1:05-1:25	0.4	Prepare for co-lead call
9/3/2009	1:25-2:00	0.6	Co-lead call
9/3/2009	2:00-2:50	0.9	PSC call
9/3/2009	9:43-11:50	2.2	
9/3/2009	3:10-6:55	3.8	Digitek MDL. Letter to co-leads on discovery issues, email with Holly, Talk to Dave on phone Figure out status of Trial cases, email Trial counsel
9/4/2009	9:15-9:35	0.4	Email
9/4/2009	11:48-1:20	1.6	Respond to Holly's email, talk to Fred, send email to Matt Moriarty re trial cases
9/4/2009	9:41-11:40	2	Look for final UDL/Mylan discovery responses, Talk to Dave, Call Debbie,
9/8/2009	10:06-10:10	0.1	Talk to Kristen Mayer
9/8/2009	11:42-11:44	0.1	Email Jeannie re recordtrak
9/8/2009	12:19-12:24	0.1	Talk to Dan Holm from MDL re amending complaint
9/8/2009	12:35-12:42	0.2	Digitek MDL – email Pete & Dave re document review
9/8/2009	11:15-11:30	0.3	Talk to David Wilharm re discovery
9/8/2009	4:40-4:53	0.3	Discovery chart
9/8/2009	9:15-9:34	0.4	Digitek MDL organization
9/8/2009	2:00-2:30	0.5	Digitek email, email re document review, start going over Digitek document production
9/8/2009	6:25-7:42	1.3	Work on Discovery Chart
9/8/2009	5:00-6:20	1.4	Digitek MDL, go back over emails catching up etc

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Digitek MDL Time

9/8/2009	2:40-4:35	2	Discovery chart
9/9/2009	3:06-3:10	0.1	email
9/9/2009	9:15-9:32	0.3	Digitek
9/9/2009	3:15-3:30	0.3	Send Pete notices for NMS depositions
9/9/2009	5:15-5:33	0.3	Talk to David Wilharm
9/9/2009	5:33-5:52	0.3	Work on objections to PTO # 39
9/9/2009	3:38-5:15	1.7	Digitek
9/9/2009	1:04-3:00	2	Discovery chart
9/9/2009	9:45-11:58	2.3	Work on Actavis Discovery Chart
9/10/2009	9:16-9:19	0.1	Assign permissions on Crivella West
9/10/2009	8:57-9:07	0.2	Email dave re Resumes, go through email
9/10/2009	4:00-5:20	1.4	Digitek MDL
9/10/2009	4:58-7:02	2.1	Get objections filed
9/10/2009	9:20-12:56	3.6	email Tim re log-in issues
9/10/2009	1:05-4:56	3.9	Work on objections
9/13/2009	5:30-8:15	2.8	Digitek discovery chart
9/14/2009	7:40-7:45	0.9	Email re Digitek meeting
9/14/2009	5:42-6:53	1.2	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/14/2009	8:55-12:30	3.6	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/14/2009	1:29-5:40	4.2	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/15/2009	7:03-8:13	0.9	Prepare for ATL trip
9/15/2009	2:00-3:35	1.6	Digitek MDL
9/15/2009	4:12-6:40	2.5	Digitek MDL
9/15/2009	8:45-11:58	3.3	Digitek, work on M/C letter, report to Court, discovery charts, talk w/ Sandy re meeting, email Hilton, talk w/ Rebecca re Lone Pine Motion, talk w/ Adrian & Sandy re Discovery Charts, sent out email re depositions
9/16/2009	4:15-11:00	6.8	Prepare for Doc Training
9/17/2009	7:00-10:10	3.2	Prepare for Doc Training
9/17/2009	10:10-1:30	3.4	Document Review Team Training
9/17/2009	1:30-7:00	5.5	Travel to

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Digitek MDL Time

9/18/2009	9:40-10:00	0.4	Digitek MDL
9/18/2009	8:45-9:30	0.8	Digitek MDL
9/18/2009	11:30-12:30	1	Meet and confer w/ Defendants
9/18/2009	2:10-8:45	6.6	Digitek MDL, respond to emails, take calls, figure out discovery letter
9/20/2009	2:30-9:25	7	Digitek discovery chart and Meet and confer letter
9/21/2009	12:05-12:17	0.2	Digitek
9/21/2009	3:05-3:11	0.25	Dzebic
9/21/2009	2:36-3:00	0.4	Talk to Fred re Digitek letter / meet& confer letter
9/21/2009	1:30-2:15	0.8	Digitek
9/21/2009	5:00-5:59	1	Digitek
9/21/2009	3:11-4:45	1.6	Digitek
9/21/2009	9:53-11:50	2	Digitek
9/21/2009	6:57-9:30	2.6	Digitek discovery chart and Meet and confer letter
9/22/2009	2:09-2:20	0.2	Digitek
9/22/2009	11:25-12:30	1.1	Digitek
9/22/2009	9:15-11:15	2	Digitek
9/22/2009	2:45-7:27	4.7	Digitek, work on PTO # 27 letter, talk to Pete, Talk to Dave, Talk to Jim (4:32-5:10), email Crivella West re kiosk & usernames, catch up on emails, email on listserv
9/23/2009	10:25-10:38	0.3	Talk to Fred & Jim Petit re motion and letter
9/23/2009	12:25-12:38	0.3	Digitek, look over document review stuff and email crivella west
9/23/2009	1:34-1:48	0.3	Digitek, look over document review stuff and email crivella west
9/23/2009	6:20-6:35	0.3	Digitek – work on lone pine motion / email
9/23/2009	7:10-7:35	0.5	Digitek – work on lone pine motion / email
9/23/2009	11:00-11:45	0.8	Digitek – work on lone pine motion / email
9/23/2009	9:05-9:58	0.9	Digitek, work on listserv, talk to Shannan
9/23/2009	10:38-12:19	1.8	Digitek – work on letter to Defendants re PTO # 27
9/23/2009	2:03-5:15	3.2	Digitek, finish up letter and talk to Fred about motions and plan with those. Talk to Pete and Jim re letter (both ok with it).
9/24/2009	3:50-3:55	0.1	Digitek talk to Pete

9/24/2009	10:18-10:25	0.2	Digitek – talk to MDL counsel (wolfpopper) re PTO # 39/41,
9/24/2009	11:19-11:29	0.2	Digitek – Work on Lone Pine Motion, talked to Dave re Motion to Compel
9/24/2009	5:35-5:47	0.2	Digitek Lone Pine
9/24/2009	1:35-1:50	0.3	Digitek
9/24/2009	9:29-9:50	0.4	Digitek – talk to Dave re motions/responses due today
9/24/2009	10:38-11:16	0.7	Digitek – Work on Lone Pine Motion
9/24/2009	11:33-12:10	0.7	Digitek – Work on Lone Pine Motion
9/24/2009	2:18-2:55	0.7	Digitek – Lone Pine
9/24/2009	4:10-5:27	1.3	Digitek – Lone Pine & Motion to Compel, Talk to Dave and Talk to Fred
9/24/2009	6:00-10:11	4.2	Digitek – Lone Pine & Motion to Compel (filing etc)
9/25/2009	10:42-11:00	0.3	Digitek MDL - Talk to Fred re Motion to Compel etc
9/25/2009	9:40-10:00	0.4	Digitek MDL
9/25/2009	11:00-11:35	0.6	Digitek –M DL – Crivella West Trainig
9/25/2009	11:35-12:06	0.6	Digitek MDL -
9/25/2009	2:15-4:00	1.8	Digitek MDL – Various
9/28/2009	9:28-9:35	0.2	Digitek emails
9/28/2009	9:11-9:26	0.3	Digitek emails
9/28/2009	2:00-2:28	0.5	Talk to Fred
9/28/2009	7:21-7:53	0.6	Prepare for Dep
9/28/2009	4:05-4:45	0.7	Talk to Guy from NMS
9/28/2009	10:00-10:45	0.8	Digitek
9/28/2009	3:30-4:15	0.8	Digitek mDL
9/28/2009	5:45-6:28	0.8	Talk to Pete re listserv, get letter printed, scanned and emailed to the Court.
9/28/2009	11:15-12:30	1.3	
9/29/2009	5:30-9:00	3.5	Travel to NMS deposition
9/29/2009	9:00-2:50	5.9	NMS Depositions
10/1/2009	2:48-3:00	0.2	Prepare for Call
10/1/2009	1:40-2:07	0.5	Email Michael Anderton re NYC office, Prepare for Call etc

10/1/2009	2:07-2:48	0.7	Co-lead call
10/1/2009	4:00-4:50	0.9	Work on Docs, and former employee logistics etc
10/1/2009	3:00-4:00	1	Call w/ Defendants
10/1/2009	9:30-10:47	1.3	Digitek MDL, email out PTO # 12 to Nia, email pete and preston, emailing re PSC meeting and call today
10/1/2009	5:25-6:49	1.4	Digitek, email to Court, get conf. room set up, work on dates for PTO # 16 changes
10/1/2009	11:16-12:45	1.5	Digitek MDL, get new user set up, email pete and preston, emailing re PSC meeting and call today
10/2/2009	12:20-12:36	0.3	Digitek MDL stuff
10/2/2009	4:05-4:35	0.5	Digitek MDL – email out PSC meeting info, email proposal to Defendants, email review team
10/2/2009	1:45-2:20	0.6	Digitek MDL Stuff
10/2/2009	9:30-11:00	1.5	Digitek MDL stuff and prepare for call
10/5/2009	8:30-9:00	0.5	MDL Stuff
10/5/2009	1:15-5:20	4.1	Stuck in Airport – got deposition notices sent out and filed
10/6/2009	4:00-6:30	2.5	Get letter out to Defendants re agreement on Discovery
10/7/2009	11:45-12:15	0.5	Various MDL
10/7/2009	3:33-4:22	0.9	Various MDL, Document review,
10/7/2009	2:17-3:18	1.1	Various MDL, Document review, ail to fred re to-do list, talked to Pete re deposition schedule
10/7/2009	4:40-5:50	1.2	Various MDL, talked to Alex re dismissals and MDL experts,
10/7/2009	6:00-7:09	1.2	Document Review
10/7/2009	9:45-11:25	1.7	Call w/ Crivella West, document review, working on calendar/updating trial dates
10/8/2009	4:10-4:29	0.4	Digitek MDL get letter approval, printed, scanned and served on the court, talked to Shamus
10/8/2009	11:00-11:30	0.5	Digitek MDL stuff
10/8/2009	9:00-10:00	1	Digitek MDL talked to clerk of Court re filing,
10/8/2009	1:30-3:30	2	Digitek MDL, talked to Pete re depositions
10/8/2009	5:38-7:39	2.1	Digitek MDL, updating all-counsel listserv, sending out email

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Digitek MDL Time

10/9/2009	2:00-2:05	0.1	Digitek MDL emails – respond to Harry and Holly
10/9/2009	3:10-3:14	0.1	Digitek MDL – email out PFS etc
10/9/2009	3:40-3:45	0.1	Email Bobby Blanchard re low dose
10/9/2009	4:05-4:15	0.2	Digitek MDL – email and add to listserv
10/9/2009	2:45-2:57	0.25	Digitek MDL, email pete
10/9/2009	11:30-11:43	0.3	Send out PSC email
10/9/2009	9:30-10:00	0.5	Digitek MDL
10/9/2009	12:30-1:05	0.6	Digitek MDL- send emails to Alan, Pat, Scott, Holy etc . Called Dave
10/9/2009	5:55-6:32	0.7	Go through Digitek MDL emails and respond
10/9/2009	10:20-11:25	1.1	Digitek MDL- PSC meeting, talk to Dave re depositions
10/12/2009	9:55-10:00	0.1	Digitek MDL go through emails
10/12/2009	12:24-12:30	0.1	Coding Documents
10/12/2009	12:31-12:37	0.1	Coding documents
10/12/2009	1:39-1:50	0.2	Digitek, prepare for call
10/12/2009	5:25-5:38	0.3	Coding documents
10/12/2009	6:21-6:37	0.3	Coding documents
10/12/2009	3:35-4:04	0.5	Document review, talk to Pete Albanis re document review
10/12/2009	3:00-3:35	0.6	Figure out NYC trip etc
10/12/2009	4:07-5:13	1.1	Coding documents- talk to Dave
10/12/2009	1:52-3:00	1.2	Prepare for Call, Call w/ Trial Counsel
10/12/2009	10:15-12:20	2	Digitek MDL, talk to David, email Pete, download motions
10/13/2009	3:16-3:18	0.1	Document review
10/13/2009	9:15-9:30	0.3	Coding documents
10/13/2009	2:53-3:13	0.4	Document review
10/13/2009	3:21-3:43	0.4	Document review and respond to mdl email re service of PFS
10/13/2009	4:03-4:25	0.4	Document review
10/13/2009	9:35-10:00	0.5	Digitek, catch up and talk to Dave
10/13/2009	11:50-12:15	0.5	Document Review
10/13/2009	12:30-1:49	1.4	Document review, talk to Dave, Talk to Terry Gomez re hotels in NYC.

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Digitek MDL Time

10/13/2009	4:39-6:09	1.5	Document review
10/13/2009	10:05-11:45	1.7	Digitek – talk to Rhonda, Ashley and Pete
10/14/2009	1:50-1:56	0.1	Document review, send email to Dave and Pete
10/14/2009	1:28-1:45	0.3	Document review
10/14/2009	11:48-12:10	0.4	Get depo notice filed , assign new doc sets
10/14/2009	10:15-11:30	1.3	Document review
10/14/2009	1:59-7:45	5.8	Document review etc
10/15/2009	9:30-12:00	2.5	Digitek Document Review
10/15/2009	2:00-6:00	4	Document Review
10/16/2009	10:00-12:00	2	Digitek
10/16/2009	1:00-5:18	4.3	Digitek
10/18/2009	8:30-12:00	3.5	Prepare for PSC meeting & depositions
10/18/2009	1:00-7:30	6.5	Travel to NYC
10/19/2009	10:00-11:20	1.4	Prepare for deps
10/19/2009	7:00am-4:00	9	Prepare for PSC Meeting, meeting w/ Crivella West, PSC Meeting, Meeting with Jim re Class Action, Work w/ David on Class cert
10/20/2009	2:45-6:30	3.8	deposition, prepare for next days deposition, discuss class cert reply
10/20/2009	7:00-2:00	7	Prepare for deposition, deposition
10/21/2009	4:00-5:00	1	General mdl stuff Dep
10/21/2009	10:00-11:00	1	Prepare for tomorrow deps
10/21/2009	5:15-6:30	1.5	Prepare for tomorrow dep.
10/21/2009	6:30-9:30	3	Prepare
10/21/2009	9:30-4:00	6.5	Eamonn Murphy Dep
10/22/2009	7:00-7:15	0.3	Prepare for deps
10/22/2009	4:20-5:30	1.2	General
10/22/2009	6:30-9:00	2.5	Prepare for deps
10/22/2009	9:00-4:00	7	Depositions Mark Toole & Rich Mayo
10/23/2009	3:10-4:47	1.7	Scan and email deposition exhibits to court reporter
10/23/2009	6:30-9:30	3	Prepare for dep
10/23/2009	9:30-2:30	5	Deposition
10/24/2009	9:00-12:00	3	Go over documents

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Digitek MDL Time

10/25/2009	12:14-12:16	0.25	Email Paul
10/25/2009	11:00-12:14	1.3	Review Docs /prepare for deps
10/25/2009	10:30-12:00	1.5	Review docs
10/25/2009	12:16-2:00	1.8	Prepare for depositions
10/26/2009	4:45-5:05	0.4	Digitek email, Digitek calls (talk to Marissa and Kayna Lydick)
10/26/2009	10:30-12:00	1.5	Prepare for dep
10/26/2009	6:30-9:30	3	Prepare for dep
10/26/2009	9:30-2:15	4.8	Deposition
10/27/2009	7:00-9:30	2.5	Prepare for dep
10/27/2009	9:30-2:30	5	Deposition
10/27/2009	2:30-9:00	6.5	Travel
10/28/2009	7:00-7:15	0.3	Email
10/28/2009	4:00-6:00	2	email :15es art & email defendants h, try to call STephanie k)
10/28/2009	10:40-12:50	2.2	
10/29/2009	3:10-3:13	0.1	Respond to mDL email
10/29/2009	4:20-4:22	0.1	Email Fred
10/30/2009	11:25-11:55	0.5	Digitek
10/30/2009	5:10-6:16	1.1	Digitek
10/30/2009	10:00-11:15	1.3	Digitek
10/30/2009	1:00-4:40	3.7	Email, talk to Carl (1:20-1:40)
11/2/2009	3:10-3:21	0.2	Talk to Dave Wilharm re Mylan articles etc
11/2/2009	11:00-11:55	1	MDL stuff, go over emails, talk to David, talk to Rhonda
11/3/2009	7:25-7:51	0.5	update custodian chart
11/3/2009	9:40-12:25	2.8	Meet w/ Fred, Talk to Alex, talk to Dave
11/4/2009	6:15-6:50	0.6	Draft letter re December depositions
11/4/2009	9:30-11:00	1.5	Reschedule expert call, finish custodian chart, go through Digitek emails,
11/5/2009	11:20-12:30	1.2	Meet w/ Fred, get letter finished and emailed to Defendants, Call w/ Shelly and Alex (12:00-12:24)

11/5/2009	3:40-7:00	3.4	Talk to David re to-do list, talk to Fred, look up clawbacked documents, upload documents (class action, depositions, exhibits etc) to Crivella West
11/6/2009	6:35-6:40	0.1	Email out Defendants Letter and Trial group deadlines to trial group counsel.
11/6/2009	10:30-11:00	0.5	MDL
11/6/2009	1:15-2:00	0.8	Digitek research
11/6/2009	12:00-12:50	0.9	Digitek – work on letter from the court, email trial counsel
11/6/2009	2:07-3:00	0.9	Digitek Research
11/6/2009	3:15-6:00	2.8	Digitek – research, talk to Fred, go over letters from Defendants, email Holly re depositions etc.
11/9/2009	12:25-12:34	0.2	Send ltr to lead counsel
11/9/2009	9:36-9:49	0.3	organize MDL files
11/9/2009	8:30-9:30	1	To back through emails, organize MDL files
11/9/2009	4:40-5:52	1.2	Get letter out, talk to Dave, look over emails re MDL, file organization.
11/9/2009	10:00-12:10	2.2	organize MDL files, look for transcript, response to Defendants letter
11/9/2009	1:45-4:15	2.5	Look over Digitek email (1:47-2:00 talk to Carl)
11/10/2009	9:30-9:40	0.2	Digitek email
11/10/2009	2:08-2:20	0.2	Digitek, talk to Sandy and Marissa re status conference, look up former employees on Lexis public records search.
11/10/2009	5:20-5:32	0.2	Email co-lead, call polly re travel
11/10/2009	12:03-12:23	0.4	Digitek – go through custodian list from Crivella wEst, go through emails
11/10/2009	3:45-4:30	0.8	Go over employee information, update charts, send charts and resumes to Holly.
11/11/2009	10:30-10:35	0.1	Talk to Carman and Sandy
11/11/2009	1:31-1:37	0.1	Talk to Pete
11/11/2009	3:50-3:56	0.1	Talk to Fred re Alex Barlow's email on Digitek
11/11/2009	12:00-12:10	0.2	Talk to Fred and Marissa
11/11/2009	12:45-12:55	0.2	Talk to Fred and Marissa

11/11/2009	9:21-9:29	0.2	Digitek emails, look over agenda, get phone message, respond to Matt & Richard's email.
11/11/2009	9:30-10:00	0.5	Call w/ co leads
11/11/2009	10:00-10:30	0.5	Call w/ Defendants
11/11/2009	8:55-9:30	0.6	Prepare for call
11/12/2009	10:00-10:19	0.4	Looking at documents
11/12/2009	9:20-9:45	0.5	Digitek, talk to Dave, go over documents on Crivella West
11/12/2009	12:39-1:10	0.6	Document review
11/12/2009	1:23-4:25	3.1	Document Review
11/13/2009	1:25-1:35	0.2	mdl
11/13/2009	1:39-1:47	0.2	Talk to Holly re Vega motion to compel and status conference (adding pill tracing to the agenda)
11/13/2009	10:42-12:20	1.7	Digitek, go through deposition files, load transcripts and exhibits on Crivella West, email Dave and Pete
11/13/2009	1:57-4:58	4.1	Download motions to compel, go through PTO's. Talk to Sandy. Print out depositions, Talk to David, Send Polly an email,
11/16/2009	5:05-5:43	0.7	
11/16/2009	1:34-2:40	1.1	Email letter out re depositions to trial group
11/16/2009	2:45-4:45	2	Work on letter to court re trial group summaries,
11/16/2009	9:49-12:33	2.8	Talk to Fred re experts, email Alex back, email Holly re depositions, send email re depositions to group, send out trial counsel email reminder
11/17/2009	3:58-4:05	0.2	Attempted Call w/ Dr. Butterly
11/17/2009	1:24-1:58	0.6	Talk to Tameka re Hilton, work on trial summaries letter,
11/17/2009	3:09-3:58	0.9	Lookover contract for Hilton, email re contract,
11/17/2009	11:14-12:19	1.1	Talk to fred about trial summary letter
11/17/2009	9:30-11:00	1.5	Talk to Carl (9:33-9:40), get letter together, email Alex/Shelly re Dr. Nelson, send out class committee email.
11/17/2009	4:50-7:01	2.2	Finally get letter scanned and emailed out, send email to defendants re Jasmine Shah, talk to Dr. Nelson, updated listserv.
11/18/2009	10:00-10:15	0.1	Digitek emails

11/18/2009	6:54-6:59	0.1	Print out letters for meeting re trial counsel
11/18/2009	1:14-1:34	0.4	Look over articles for sending to expert
11/18/2009	1:56-2:18	0.4	Talk to dave re call w/ Dr. Nelson and class action
11/18/2009	2:30-3:04	0.6	Call w/ Dr. R.?
11/18/2009	10:20-11:00	0.7	Prepare for call, Talk to Dave
11/18/2009	4:00-4:45	0.8	Call w/ Dr. Butterly
11/18/2009	3:04-4:00	1	Get contract with Hilton updated and faxed out, go over with Sandy the items to be printed etc for Status Conference
11/18/2009	5:35-6:45	1.2	Prepare for Status Conference, remove names from listserv
11/18/2009	7:15-8:30	1.3	Print/Organize information for Status Conference
11/18/2009	11:00-12:25	1.5	Call w/ Dr. Nelson
11/19/2009	10:45-11:30	0.8	Prepare for status conference
11/19/2009	3:15-9:40	6.5	Travel to West Virginia
11/19/2009	6:00-1:00	7	Travel to Boston
11/20/2009	5:50-6:00	0.2	Respond to emails
11/20/2009	7:10-7:45	0.6	Respond to emails, send notices to M. Anderton
11/20/2009	5:45-6:50	1.1	Prepare for status conference and meeting
11/20/2009	9:00-10:14	1.3	Prepare for hearing and hearing
11/20/2009	10:14-12:00	1.8	Status Conference
11/20/2009	6:50-9:00	2.2	Walk to Harry's office and have Digitek trial counsel meeting
11/20/2009	1:15-5:50	4.6	Travel back from W.Va
11/23/2009	9:56-10:02	0.1	Talk to David Wilharm re hearing on Friday and cases picked
11/23/2009	2:39-2:43	0.1	Talk to sandy re notices and
11/23/2009	3:37-3:42	0.1	Email Anna re depositions, read Mike Patrick's email, send email to Will Maiberger
11/23/2009	11:38-11:48	0.2	Talk to Joanne M. from rodanast
11/23/2009	2:00- 2:10	0.2	Send ECF log-in to Sandy for notice filing .
11/23/2009	3:30-3:37	0.2	Respond to John Malkenson's email
11/23/2009	3:42-3:49	0.2	Read letter from defendants and forward on with email to deposition group
11/23/2009	12:25-12:39	0.3	Talk to fred about status conference and December depositions

11/23/2009	1:04-1:21	0.3	Respond to Carl's email, read Michael's email, go talk to Sandy about notices, (she wasn't there) email example
11/23/2009	2:56-3:10	0.3	Talk to Sandy re notices, save and send Deposition Notices to Mike. Email Mike re certificate of service.
11/23/2009	11:05-11:29	0.4	Talk to Marissa re conf. call time, email back Ed/group re meeting, email Jim, go over status conference with Sandy
11/23/2009	4:43-5:04	0.4	Talk to Dave
11/23/2009	6:40-7:12	0.6	Digitek MDL
11/24/2009	5:01-5:05	0.1	Email cayce Peterson re crivella west
11/24/2009	5:43-5:45	0.1	Email to Don Ernst and Don Ledger
11/24/2009	12:00-12:10	0.2	Digitek MDL
11/24/2009	1:45-1:56	0.2	Talk to Dave
11/24/2009	1:20-1:35	0.3	Digitek MDL
11/24/2009	5:12-5:41	0.5	Digitek – talk to Fred and respond to Matt's email
11/24/2009	11:00-11:48	0.9	Call w/ Trial Counsel & Deposition Group
11/24/2009	3:40-4:45	1.1	Talk to Fred (3:40-3:48), email Michael Anderton, email deposition group,
11/24/2009	9:30-11:00	1.5	Prepare for call
11/25/2009	2:30-3:22	0.9	Digitek mDL – get notice filed, email dave re new custodians
11/30/2009	3:06-3:08	0.1	Read over Ed Blizzards email re deponents.
11/30/2009	6:40-6:43	0.1	Email Peggy back about Transcript Bills
11/30/2009	7:45-7:55	0.2	Organize email from listserv from this weekend
11/30/2009	2:05-2:13	0.2	Read Michael's email and send on to deposition group.
11/30/2009	7:42-8:00	0.3	Digitek – work on depo transcripts for letter to defendants
11/30/2009	10:18-11:19	1.1	Respond to Alex's email. Pull dismissals from Pacer and email to Alex and Kristin. Email doc review notebook to Marlyn at Camp's office. Go through some Digitek emails .
11/30/2009	3:55-5:45	1.9	Digitek – work on depo transcripts for letter to defendants, email Vince from Crivella West back, email Dave re production disks (did Debbie send them). Read letter from Defendants on Rule 11/Lone Pine. Email Golkow re December depositions.

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Digitek MDL Time

12/1/2009	11:11-11:20	0.2	Go over Golkow confirmations and email to Sandy, look over PSC expenses, email Terry
12/1/2009	1:08-1:20	0.2	Try to make call backs. Calling Kayna Liedig etc
12/1/2009	12:43-1:04	0.4	
12/1/2009	9:00-9:20	0.4	Digitek Deposition stuff,
12/1/2009	11:22-12:07	0.8	Email dave, pete & tony re documents and depositions, calc # of docs for depos and get schedule together.
12/1/2009	10:00-11:05	1.1	Digitek, talk to Pete, Talk to Marissa, go over email
12/1/2009	10:00-11:20	1.4	Digitek Deposition stuff,
12/1/2009	3:00-6:15	3.3	Digitek Deposition stuff,
12/2/2009	4:32-4:37	0.1	Add in Fred's changes to letters to Defendants
12/2/2009	10:49-11:00	0.2	Prepare for call
12/2/2009	4:41-4:50	0.2	Talk to David re Digitek ltrs to def & doc review
12/2/2009	4:50-5:08	0.3	Talk to Carl
12/2/2009	5:14-5:48	0.6	Add Fred's changes to letters and get notices served.
12/2/2009	11:00-11:40	0.7	Call w/ trial counsel/depos/etc
12/2/2009	2:00-2:41	0.7	Work on 30(b)(6) depo notices and letters re subpoenas and objections based on PTO # 27
12/2/2009	2:45-3:30	0.8	Work on 30(b)(6) depo notices and letters re subpoenas and objections based on PTO # 27 (Talk to Fred from 3:15-3:30)
12/2/2009	11:40-12:35	0.9	Talk to Fred & Sandy re MDL expenses, action list and work on items from call.
12/2/2009	3:40-4:27	0.9	Talk to Fred from 3:40-4:00. Work on 30(b)(6) depo notices and letters re subpoenas and objections based on PTO # 27
1/4/2010	9:05-9:09	0.1	Respond to email from MDL person requesting PFS
1/4/2010	9:29-9:31	0.1	Respond to Crivella West email
1/4/2010	4:15-4:20	0.1	Respond to Mike's email
1/4/2010	6:35-6:37	0.1	Email holly
1/4/2010	11:11-11:18	0.2	Send out action items to science & expert committee
1/4/2010	3:43-3:51	0.2	Talk to Mike McGown and email group
1/4/2010	3:11-3:24	0.3	Leave message for Sandy re Chandu Patel Subpoena

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Digitek MDL Time

1/4/2010	1:30-1:58	0.5	Digitek email, answer holly
1/4/2010	5:20-6:00	0.7	email re subpoena, look over depositions
1/4/2010	10:20-11:05	0.8	Talk to Mitch re research assignment, talk to Sandy re depositions, talk to Pete re experts
1/4/2010	1:59-2:50	0.9	Digitek- talk to Divya Patel's lawyer, confirm with Fred, send emails to Holly & Ed, email group, reply to Mr. Charrow, Divya's lawyer
1/4/2010	4:22-5:11	0.9	Talk to Sandy, Talk to Dave, talk to Marissa re deadlines, email re subpoena, look over depositions
1/5/2010	10:30-10:51	0.4	Talk to Kowalksi then talk to Fred & Sandy
1/5/2010	11:02-11:22	0.4	Save & Upload depo transcripts and exhibits to crivella west
1/5/2010	1:10-1:32	0.4	Review depositions
1/5/2010	10:00-10:30	0.5	Digitek
1/5/2010	1:35-2:25	0.9	Review depositions; talk to sandy re exhibits & documents for Kowalski
1/5/2010	5:00-7:32	2.6	Reviewing depositions
1/6/2010	9:40-10:15	0.6	Digitek emails, talk to Dave, work on calendar
1/6/2010	10:20-12:06	1.8	Review deposition, meet briefly w/ Crivella West, work on letter to judge re scheduling order deadlines.
1/6/2010	2:10-5:51	3.7	Edit Fred's draft of letter, Review depositions, talk to Carl & dave re letter, talk to Fred and get his edits on letter, talk to Mitch re research assignment, talk to Mitch & Fred re research assignment,
1/7/2010	6:19-6:23	0.1	Email addresses
1/7/2010	3:31-3:55	0.4	Digitek, answered questions from an MDL caller
1/7/2010	6:28-7:17	0.9	MDL email
1/7/2010	4:06-6:10	2.1	Talk to Ashley Ownby, talk to Pat & Andy, talk to Hunter re Rite Aid, talk to Liza re depositions
1/7/2010	12:46-2:57	2.2	Prepare for PSC Meeting
1/7/2010	8:50-11:51	3.1	Digitek, prepare for PSC meeting, review depositions
1/8/2010	5:37-6:10	0.6	Pto # 49, email, etc
1/8/2010	11:00-12:05	1.1	Call w/ David (then about 10 minutes talking w/ Sandy Carmen & Fred)

1/8/2010	9:45-11:00	1.3	Reviewing deposition, talk to Pete, talk to Lisa, wend out emails to Tony & Cyndi R.
1/8/2010	12:39-2:00	1.4	Reviewing deposition
1/8/2010	2:50-5:25	2.6	Reviewing depositions, looking over excerpts, letter to Defendants, working on depo schedule
1/11/2010	4:10-4:18	0.2	Digitek – send around Mitch’s research
1/11/2010	12:20-1:00	0.7	Talk to Mike re depositions/subpoenas. Email w/ Holly/Sofia re subpoenas, Work on to do list
1/11/2010	8:55-10:25	1.5	Respond to email, correct minutes, talk to Fred, talk to Sandy re notices
1/11/2010	10:30-12:15	1.8	Set up call w/ Crivella West and depo people for document review. Talk to Sandy about amended depositions/notices. Work on to do list and deposition schedule etc.
1/11/2010	2:00-4:00	2	motion, deposition schedule etc.
1/12/2010	3:39-3:42	0.1	Digitek email re document training.
1/12/2010	3:42-4:10	0.5	Talk to Mitch re Motion to Compel and catch him up some.
1/12/2010	12:30-1:20	0.9	MDL
1/12/2010	4:15-5:14	1	Digitek - save response from Defendants and email out, talk to Marissa about flights schedule, look up local procedural rules, look over Renillo stuff, review jim’s email re Bitler Deposition.
1/12/2010	1:45-3:18	1.6	MDL
1/12/2010	9:45-12:15	2.5	MDL
1/13/2010	1:00-1:06	0.1	Email re Divya Patel deposition
1/13/2010	12:45-12:55	0.2	Talk to Marissa re travel schedule
1/13/2010	1:43-1:50	0.2	Emails re Li Radtke deposition
1/13/2010	2:52-3:24	0.6	Go over travel plans, review email on document repository and talk to Carl (20 mins) re Mylan Depositions
1/13/2010	5:00-6:01	1.1	Digitek, talk to Sophia re Lambridis depo, talk to Marissa re Gilmore’s brother, email with Mike Anderton and get notices served.
1/13/2010	9:48-12:35	2.9	
1/14/2010	11:38-11:43	0.1	Talk to Sandy

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Digitek MDL Time

1/14/2010	4:25-4:30	0.1	Email Stephanie re discovery
1/14/2010	9:30-9:40	0.2	Digitek email
1/14/2010	12:26-12:33	0.2	Work on schedule
1/14/2010	10:40-10:55	0.3	Talk to Sandy
1/14/2010	5:49-6:02	0.3	Look for facts/ read depo
1/14/2010	11:46-12:26	0.7	Talk to Stephanie re new records and email group. Review deposition
1/14/2010	4:30-5:10	0.7	Crivella West Call then talk to Pete & Dave to divvy up work .
1/14/2010	6:10-7:29	1.4	Look for facts/ read depo
1/14/2010	1:50-4:25	2.6	Work on going over facts, reading deposition, talking with Mitch to plan out Motion to Compel
1/15/2010	1:44-1:46	0.1	MDL email
1/15/2010	1:55-1:56	0.1	MDL email
1/15/2010	5:40-8:23	2.8	Prepare for depositions, talk to Fred (10 min) re schedule and letter to go out, document review
1/15/2010	2:08-5:30	3.4	Depo prep, figure out notices of postponement (marissa filed)
1/15/2010	9:35-1:01	3.5	Talk to Fred 10:00-10:17
1/16/2010	9:00-10:00	1	Prep for depo and read deposition
1/16/2010	4:20-7:00	2.7	Prep for depo and read deposition
1/17/2010	10:00-11:15	1.3	
1/17/2010	5:15-8:20	3.1	Prep for dep/document review/
1/17/2010	11:00-3:10	4.2	Travel (reading on plane)
1/18/2010	5:15-12:05	6.9	Travel
1/18/2010	7:15-5:15	10	Depo Prep and at Deposition
1/19/2010	10:50-11:00	0.2	Talk to Marissa and MDL email
1/19/2010	2:35-7:30	5	Prepare for depositions
1/20/2010	6:30-7:30	1	Prepare for depositions
1/20/2010	2:00-3:30	1.5	At Carl's office working
1/20/2010	9:00-12:30	1.5	Prepare for Deposition, talk to Marissa and Pat Avery re getting brief filed.
1/20/2010	3:00-4:45	1.8	Travel
1/20/2010	4:45-7:00	2.3	Work

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Digitek MDL Time

1/20/2010	8:00-2:00	6	Travel (while traveling work on class action stuff)
1/21/2010	9:00-9:45	0.8	At depo figuring out court reporter
1/21/2010	9:45-11:15	1.5	Depo prep
1/21/2010	4:30-6:00	1.5	Depo Prep
1/21/2010	7:00-8:45	1.8	Depo Prep
1/21/2010	9:00-11:00	2	Depo Prep
1/21/2010	11:15-4:30	5.3	Depo
1/22/2010	6:30-8:15	1.8	Printing documents/ depo prep
1/22/2010	4:00-12:30	4.5	Travel
1/22/2010	9:00-4:00	7	At depositions
1/23/2010	2:40-6:50	4.2	Document review
1/24/2010	7:28-8:10	0.7	Talk to Pete re deposition, look up notices, talk to Pete again
1/24/2010	5:00-6:55	2	Travel (sit at airport until Flight is cancelled)
1/24/2010	10:00-3:45	5.8	Prepare for Bitler & Zhu Deposition
1/25/2010	8:30-8:35	0.1	Talk to Pete re deposition
1/25/2010	8:00-8:15	0.3	Talk to Pete re deposition
1/25/2010	2:10-2:35	0.5	Talk to Mitch and/or Lance re expert and MILs
1/25/2010	12:08-1:10	1.1	Talk to Pete Re Deposition (12:08-12:13), work on listserv, email Crivella West
1/25/2010	2:45-4:00	1.3	Work on Digitek Motion; work on exhibit lists;
1/25/2010	4:30-7:55	3.5	Digitek – depo prep (get docs together for Fred) and document review.
1/26/2010	6:00-7:30	1.5	Work on deposition and talk to Fred re deposition
1/26/2010	8:45-12:30	3.8	Prepare for deposition
1/26/2010	1:00-5:30	4.5	Travel
1/27/2010	6:45-9:00	2.3	Depo prep
1/27/2010	8:00-10:30	2.5	Depo Prep
1/27/2010	9:00-3:00	6	Deposition
1/28/2010	6:30-9:00	2.5	Depo prep
1/28/2010	9:00-1:45	4.8	Deposition
1/28/2010	2:30-7:30	5	At airport/ travel

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Digitek MDL Time

1/29/2010	5:47-5:53	0.1	Digitek
1/29/2010	6:05-6:41	0.6	Digitek
1/29/2010	10:00-12:10	2.2	Meeting w/ Fred, etc
1/29/2010	1:10-4:50	3.7	Digitek (2:50-3:07 talk to Carl)
1/31/2010	5:30-6:40	1.2	
1/31/2010	9:30-11:00	1.5	Reading depositions
2/1/2010	9:00-9:18	0.3	
2/1/2010	9:47-10:00	0.3	Digitek
2/1/2010	1:10-1:26	0.3	
2/1/2010	2:36-2:53	0.3	Digitek, talk to Sofia, email defense counsel re Divya
2/1/2010	6:30-6:52	0.4	Emails; calendaring etc
2/1/2010	5:44-6:12	0.5	Digitek
2/1/2010	10:16-10:50	0.6	
2/1/2010	11:00-11:35	0.6	
2/1/2010	1:47-2:20	0.6	Work with Sandy on Crivella West,
2/1/2010	7:13-8:02	0.9	Digitek Housekeeping
2/1/2010	11:44-1:00	1.3	
2/1/2010	10:00-12:00	2	Reading P. Lambridis Deposition
2/1/2010	2:56-5:30	2.6	Read depositions, talk to Sofia, Crivella West Call
2/2/2010	12:30-12:34	0.1	Talk to Carmen re Matt's email
2/2/2010	12:35-12:40	0.1	Talk to Mitch re adulterated product research and motion
2/2/2010	12:45-1:00	0.3	Prepare for call w/ Defendants
2/2/2010	1:45-1:58	0.3	Talk to Fred and email Ed re Jasmine Shah and Eng and send hot doc to Harry.
2/2/2010	2:45-3:10	0.5	Email Fletch & Chris at Crivella West
2/2/2010	12:00-12:46	0.8	Reading P. Lambridis Deposition
2/2/2010	1:00-1:45	0.8	Call with Defendants
2/2/2010	7:52-9:10	1.3	
2/2/2010	9:13-12:20	3.2	Read Bitler's deposition for MTC quotes, 10:30-11:00 call with co-leads. 11:00-11:15 – talk to fred, Sandy & Carmen re MDL trial cases, Read Bitler's deposition some more

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Digitek MDL Time

2/2/2010	3:25-7:09	3.8	Document review, talk to Dave (4:20-4:30) Crivella West Call (4:30-5:) Document review, deposition review etc
2/3/2010	1:15-1:22	0.2	Digitek
2/3/2010	11:00-11:45	0.8	Digitek
2/3/2010	9:30-10:30	1	Digitek
2/3/2010	2:55-6:03	3.2	Digitek; work on motion, scheduling deponents; call w/ Crivella West
2/4/2010	12:19-12:25	0.1	Talk to pete
2/4/2010	5:02-5:14	0.2	Digitek
2/4/2010	1:45-3:11	1.5	
2/4/2010	3:35-5:00	1.5	(4:30-4:40ish Crivella West Call)
2/4/2010	5:17-7:46	2.5	Work on Motion
2/4/2010	8:20-11:58	3.7	Work on motion, talk to Mitch, email
2/5/2010	5:44-5:58	0.3	Digitek
2/5/2010	4:23-5:20	1	MDL stuff; Crivella West Call; talk to Sandy & Marissa re filing motion next week.
2/5/2010	2:25-4:13	1.9	
2/5/2010	11:13-2:00	2.9	Look up exhibits, work on motion, emails re depositions etc
2/5/2010	7:20-11:00	3.7	Work on Motion
2/7/2010	10:00-1:25	3.3	Prepare for depositions
2/7/2010	1:25-5:30	4.1	Travel
2/7/2010	5:30-11:30	6	Doc review for Depo
2/8/2010	12:30-1:40	1.2	Lunch with Fletch – going over tomorrow's depo
2/8/2010	8:30-11:30	3	Doc review etc/ depo prep
2/8/2010	3:30-8:00	4.5	Working on motion, depo prep
2/8/2010	7:35-12:30	5	Depo prep and depo (Nasrat Hakim)
2/9/2010	9:00-11:30	2.5	Depo prep for Sigg
2/9/2010	6:45-11:15	4.5	Depo prep and depo (Chris Young)
2/9/2010	12:00-7:30	7.5	Depo prep for Sigg
2/10/2010	6:30-7:45	1.3	Digitek general
2/10/2010	6:00-5:15	11.3	Depo prep and Sigg Deposition

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Digitek MDL Time

2/11/2010	4:00-6:30	2.5	Digitek email, organization etc
2/11/2010	7:15-12:30	5.3	Prepare for conf w/ court, status conference, Digitek work in general.
2/12/2010	9:00-9:45	0.8	Digitek
2/12/2010	11:00-7:35	8.6	Travel
2/15/2010	12:10-12:20	0.2	Email
2/15/2010	6:05-6:20	0.3	Email
2/16/2010	2:33-2:41	0.2	Talk to Sandy re subpoena
2/16/2010	2:55-3:04	0.2	Talk to MDL lawyer
2/16/2010	9:40-10:10	0.5	Digitek MDL
2/16/2010	4:28-5:11	0.8	Digitek
2/16/2010	1:20-2:20	1	Digitek MDL
2/16/2010	10:25-11:30	1.1	Digitek MDL
2/16/2010	11:43-12:45	1.1	Digitek MDL
2/16/2010	5:34-7:00	1.5	Digitek – work on RFP's for NYC depositions
2/17/2010	4:35-4:58	0.4	Digitek MDL
2/17/2010	12:03-12:31	0.5	Work on motion/depo excerpts
2/17/2010	1:32-2:00	0.5	Digitek MDL
2/17/2010	2:00-2:45	0.8	Digitek MDL
2/17/2010	5:37-7:07	1.5	MDL email, add to listserv, look over depo excerpts for motion
2/17/2010	3:01-4:33	1.6	Look up experts, email w/ Jim etc
2/17/2010	9:55-11:34	1.7	Email Michael anderton re depositions, email about Apurva dates, talk to Sandy re getting transcripts online, talk to Pete re update, email Michael Anderton re Misbah, email Divya's counsel, submit RFP for Marriott in NJ
2/18/2010	9:50-10:10	0.4	Digitek MDL
2/18/2010	2:45-3:19	0.6	Digitek MDL
2/18/2010	1:19-2:03	0.8	Digitek MDL
2/18/2010	10:15-11:20	1	Talk to Pete, work on exhibits
2/18/2010	4:42-5:58	1.3	Talk to Fred, try to call expert, look up Marriott information
2/18/2010	6:15-7:32	1.3	Work on motion, fixing citations adding info from PTO # 52 etc.

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Digitek MDL Time

2/19/2010	9:45-10:00	0.3	Digitek MDL
2/19/2010	10:08-1:20	3.5	Digitek MDL
2/22/2010	9:47-10:00	0.3	Prep for call
2/22/2010	10:00-10:30	0.5	Call w/ Crivella West
2/22/2010	10:30-11:00	0.5	MDL talk with Carmen, Fred & Sandy
2/22/2010	11:30-12:40	1.2	Digitek – document review etc
2/22/2010	2:15-8:13	6	Digitek – document review etc
2/23/2010	12:48-12:51	0.1	Document review
2/23/2010	12:34-12:44	0.2	Document review
2/23/2010	9:30-9:48	0.3	Digitek
2/23/2010	4:37-5:48	1.2	Doc review
2/23/2010	2:04-4:30	2.5	Talk to Sandy & Marissa re docs to send to expert, talk to Pat Avery (called Angie & Rowena (clerk) to discuss filings), looked up Milligan info, pull out additional docs for experts, document review
2/23/2010	9:53-12:28	2.6	Digitek – document review etc
2/24/2010	12:44-12:46	0.1	
2/24/2010	1:16-1:18	0.1	
2/24/2010	6:30-7:10	0.7	Going through docs
2/24/2010	11:15-12:20	1.1	
2/24/2010	9:14-11:13	2	
2/24/2010	1:38-6:00	4.4	
2/25/2010	2:10-2:13	0.1	Email to Denise re expenses
2/25/2010	6:22-6:26	0.1	Mdl
2/25/2010	10:15-10:30	0.3	Digitek
2/25/2010	6:36-6:55	0.4	Mdl email
2/25/2010	9:30-10:12	0.7	Digitek
2/25/2010	3:16-4:00	0.8	Digitek
2/25/2010	10:48-11:35	0.9	Digitek, look over Paul Galea's stuff etc
2/26/2010	9:40-9:44	0.1	Digitek
2/26/2010	10:30-11:00	0.5	Digitek
2/26/2010	11:43-12:19	0.6	Digitek – extension

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Digitek MDL Time

2/26/2010	2:05-6:15	4.2	Digitek
3/1/2010	9:24-9:30	0.1	Talk to Sandy re depositions
3/1/2010	10:39-10:44	0.1	Digitek organization
3/1/2010	1:29-1:31	0.1	Read email from angie, work on letters
3/1/2010	9:30-9:40	0.2	Catch up on email etc
3/1/2010	1:54-2:01	0.2	Look over calendar, email Fred etc re dates.
3/1/2010	9:45-10:03	0.3	Digitek emails
3/1/2010	2:06-2:26	0.4	Talk to Pete
3/1/2010	10:49-12:26	1.7	Digitek, emails, work on letters, go through paul galea's dep for letter, talk to Mitch re priv log, send order to class group, send email to Pete
3/1/2010	2:38-6:44	4.1	Work on letters, talk to sandy, talk to Fred re things to do in MDL, PSC meeting etc, PSC email, listserv, Deposition Schedule, email to Ericka re Mylan Depositions,
3/2/2010	12:23-12:53	0.5	Talk to Marissa re list of things for Fred and PSC Meeting, email about Priv/redac log.
3/2/2010	9:25-10:50	1.5	Digitek Rsvp list, talk to Dave (9:55-10:07) re priv log and clawback docs, talk to Sandy re depo notices, look over Renillo bill, look over ltr from def re dates,
3/2/2010	1:02-2:45	1.8	Go over emails, Paul Galea information, send emails to Matt, send scheduling email to harry/carl, respond to Class Action email, work on Mylan deponents stuff
3/2/2010	2:58-5:25	2.5	Get letters to court, go over Mylan docs/deponents etc
3/3/2010	11:07-11:12	0.1	Send emails re PSC meeting and expert
3/3/2010	10:02-10:14	0.2	Digitek emails
3/3/2010	3:26-3:33	0.2	Digitek
3/3/2010	9:30-9:45	0.3	Digitek – call Kristen and give extension
3/3/2010	11:20-11:37	0.3	Email to Pat, Kristen etc
3/3/2010	2:00-2:20	0.4	Digitek
3/3/2010	5:34-5:55	0.4	Digitek –get Mylan depo email finished and out
3/3/2010	7:02-7:24	0.4	Digitek, email

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Digitek MDL Time

3/3/2010	6:00-6:30	0.5	Emails and Digitek – Class Action Stuff, email Holly re Mylan depos,
3/3/2010	11:55-12:31	0.7	Digitek emails, go talk to Sandy & Marissa
3/3/2010	3:52-5:25	1.6	Digitek (4:00-4:45 talk to Dr. Luttrell expert with Pete and Jim), also talked to Pete again after that.
3/4/2010	10:29-10:40	0.2	Talk to Fred
3/4/2010	3:30-3:37	0.2	Digitek
3/4/2010	3:55-4:05	0.2	Digitek
3/4/2010	4:13-4:37	0.4	Digitek
3/4/2010	10:00-10:29	0.5	Call w/ Defendants
3/4/2010	10:40-11:05	0.5	Talk to Fred & Carl
3/4/2010	9:20-10:00	0.7	Digitek
3/4/2010	11:05-12:49	1.8	
3/5/2010	11:07-11:10	0.1	Digitek – Talk to Sandy
3/5/2010	12:12-12:15	0.1	Digitek email
3/5/2010	5:16-5:19	0.1	Email to Capretz (Gilmore case) re carey walker)
3/5/2010	12:29-12:37	0.2	Digitek – PSC agenda and get medical docs to Fred.
3/5/2010	5:03-5:10	0.2	Digitek – call back MDL person
3/5/2010	1:50-2:15	0.5	Digitek
3/5/2010	9:30-10:05	0.6	Digitek
3/5/2010	10:11-10:57	0.8	Digitek
3/5/2010	4:02-4:57	1	Digitek
3/5/2010	2:21-4:00	1.7	Digitek
3/8/2010	2:15-2:18	0.1	Legal periodicals – searching for article
3/8/2010	3:13-3:14	0.1	Email
3/8/2010	3:00-3:13	0.3	assessment order, agenda, PSC meeting planning.
3/8/2010	1:30-1:55	0.5	Digitek MDL
3/8/2010	9:20-10:00	0.7	Digitek
3/8/2010	10:33-12:30	2	Digitek
3/8/2010	3:15-6:14	3	Digitek
3/9/2010	1:50-2:15	0.5	Prepare for meeting etc
3/9/2010	2:36-3:05	0.5	Prepare for meeting etc Digitek

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Digitek MDL Time

3/9/2010	10:00-12:50	2.9	Prepare for meeting etc
3/9/2010	7:00-10:00	3	PSC Dinner
3/9/2010	3:16-7:00	3.8	Various Digitek emails, prepare for meeting
3/10/2010	5:20-5:24	0.1	Digitek
3/10/2010	2:30-3:45	1.3	Talk to fred, Carl & Pete
3/10/2010	7:30-9:00	1.5	Prep for PSC meeting/ bring guests up etc
3/10/2010	3:45-5:15	1.5	Digitek
3/10/2010	9:00-2:30	5.5	PSC Meeting
3/15/2010	1:40-2:00	0.4	Talk to Pete, prepare for call
3/15/2010	3:08-4:00	0.9	Talk to Pete, talk to Dave before call, prep for call and depos etc
3/15/2010	2:00-3:08	1.2	Call w/ Spyglass
3/15/2010	4:00-5:25	1.5	Call w Mike Anderton, Ed Blizzard and David Wilharm, then call with Ed & Dave, then finish up
3/15/2010	8:45-12:50	4.1	Digitek
3/16/2010	8:30-9:50	1.4	Depo Prep
3/16/2010	9:00-11:50	2.9	Prepare for depos
3/16/2010	12:20-8:00	7.7	Travel to NYC
3/17/2010	6:45-7:30	0.8	Depo prep and print docs
3/17/2010	7:30-8:30	1	Breakfast with Pete & Fred to go over depo stuff
3/17/2010	8:30-9:30	1	Depo prep
3/17/2010	5:30-7:15	1.8	Dinner w/ Fred *& Pete
3/17/2010	8:30-5:30	9	Depo
3/18/2010	7:45-8:25	0.7	Breakfast with Pete & Fred
3/18/2010	6:45-7:45	1	Depo prep
3/18/2010	4:45-6:30	1.8	Digitek
3/18/2010	7:30-9:30	2	Dinner w/ Pete & Ed, Sophia
3/18/2010	8:30-3:45	7.3	Depo
3/19/2010	8:00-10:30	2.5	At depo
3/19/2010	12:00-5:40	5.7	Travel
3/22/2010	6:15-8:58	2.8	Finish up Reply and get it filed
3/22/2010	12:10-3:05	3	Digitek – reply

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Digitek MDL Time

3/22/2010	8:00-12:00	4	Digitek – reply
3/23/2010	4:08-5:05	1	Talk w/ Carl, Fred & Carmen
3/23/2010	9:30-11:25	2	Digitek
3/23/2010	5:05-7:08	2.1	Digitek MDL – email to expert, reviewing docs
3/23/2010	1:46-3:56	2.2	Expert stuff – looking at inspection agenda, email Crivella West, Email with Dave, email out exhibit list, try to call pete, email Pete,
3/24/2010	1:13-1:15	0.1	Email to spyglass re conference call
3/24/2010	5:11-5:20	0.2	Email to Crivella West and Golkow
3/24/2010	6:50-7:10	0.3	Email Hunter and Texas guy Mike, call Ryan Gertz (leave a message)
3/24/2010	2:10-3:00	0.9	Send emails re dates for depositions, send email re Crivella West Expert kiosk, go over kiosk with Sandy, prepare for call
3/24/2010	3:00-3:55	1	Call with Mark from Spyglass and Pete
3/24/2010	3:55-5:04	1.2	Digitek
3/24/2010	5:20- 6:50	1.5	Prepare for call, call
3/24/2010	9:30-12:56	3.5	Digitek
3/25/2010	9:30-11:00	1.5	Doc review
3/25/2010	8:45-10:30	1.8	Digitek
3/25/2010	10:30-2:30	4	Travel
3/25/2010	2:30-7:30	5	Call w/ CW, meet w/ Ed and Sofia, and Mike (golkow), email to Mike
3/26/2010	6:00-11:30	5.5	Travel
3/26/2010	7:00-5:00	10	Depo - Jasmine Shah (including admin stuff with Marriott)
3/29/2010	7:00-10:00	3	Prepare for depo
3/29/2010	8:50-12:00	3.2	Digitek, prepare for depo
3/29/2010	1:00-5:30	4.5	Travel
3/30/2010	10:00-11:15	1.3	Prep
3/30/2010	7:00-8:30	1.5	Prepare for Depo
3/30/2010	4:30-6:30	2	Digitek
3/30/2010	7:00-9:00	2	Dinner w/ Pete & Fred
3/30/2010	8:30-11:00	2.5	Talk w/ Fred & Pete
3/30/2010	11:00-4:15	5.3	Deposition – Sarita Thapar

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Digitek MDL Time

3/31/2010	7:00-1:15	6.3	Prep and Depo -Ashok Nigalaye
3/31/2010	1:15-10:30	9.3	Travel
4/1/2010	9:30-11:00	1.5	Digitek – subpoenas and doc review etc
4/1/2010	1:45-4:30	2.8	Digitek – subpoenas and doc review etc
4/2/2010	9:45-10:30	0.8	Digitek – schedule depositions
4/2/2010	11:45-12:35	0.9	Digitek MDL, email, send email to Carl etc
4/2/2010	1:00-5:00	4	Digitek, talk to Carl, schedule Trial counsel Call
4/5/2010	8:55-9:00	0.1	Prep for Call
4/5/2010	1:45-1:54	0.2	
4/5/2010	12:42-1:00	0.3	Talk to Hunter
4/5/2010	10:41-11:00	0.4	Talk to Mark from Spyglass
4/5/2010	11:02-11:25	0.4	Talk to Fred, email resume to Blizzard
4/5/2010	11:42-12:09	0.5	Email back Apurva Patel's counsel (after confirming date with Fred), email Crivella West re expert usernames and passwords
4/5/2010	12:12-12:42	0.5	Email Pete, talk to Fred
4/5/2010	9:00-10:04	1.1	Call w/ Spyglass & Somma and Pete
4/5/2010	2:35-6:38	4.1	Talk to Carl (4:34-4:50), talk to Fred twice (about deponents then to ok letter), figure out deposition list, email letter to Defendants etc
4/6/2010	12:50-1:00	0.2	Prep for call
4/6/2010	5:54-6:25	0.6	Email Matt re tolling agreement,
4/6/2010	6:27-6:58	0.6	Digitek
4/6/2010	3:54-4:39	0.8	Digitek
4/6/2010	3:02-3:50	0.9	Digitek – email,
4/6/2010	1:00-2:21	1.4	Call with Experts
4/6/2010	9:40-11:50	2.2	Digitek
4/7/2010	12:30-12:50	0.4	Talk to Matt re Tolling
4/7/2010	6:33-7:00	0.5	Digitek
4/7/2010	9:40-12:30	3.9	Digitek, work on expert kiosk
4/7/2010	1:50-5:53	4.1	Digitek
4/8/2010	8:55-9:16	0.4	Prep for call & Call w/ Crivella West
4/8/2010	10:45-11:55	1.2	Prep for call w. Trial Counsel, Call w/ Trial Counsel, and talk to Fred

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Digitek MDL Time

4/8/2010	9:17-10:45	1.5	Digitek – working on
4/8/2010	11:55-1:20	1.5	Work on expert kiosk etc
4/8/2010	2:20-6:00	3.7	Digitek, work on expert kiosk, calendar etc
4/9/2010	8:00-8:01	0.1	Digitek email
4/9/2010	11:15-1:20	1.6	Digitek
4/9/2010	9:30-10:45	1.8	Digitek emails, expert training etc
4/9/2010	1:20-6:30	5.2	Digitek etc , Tolling agreement instructions etc
4/11/2010	2:00-2:05	0.1	Email
4/12/2010	1:40-1:55	0.3	Digitek
4/12/2010	2:18-2:45	0.5	Digitek
4/12/2010	8:00-9:30	1.5	Dinner w/ Fred discussing hearing
4/12/2010	9:30-12:00	2.5	Digitek
4/12/2010	2:45-7:50	5.1	Travel
4/13/2010	12:30-1:30	1	Lunch to discuss hearing and next moves
4/13/2010	11:00-12:30	1.5	Hearing and at Court house
4/13/2010	7:40-11:00	3.4	Prep for hearing and go to courthouse
4/13/2010	1:30-6:00	4.5	Travel
4/14/2010	1:55-3:53	2	Digitek
4/14/2010	4:05-6:42	2.7	Digitek
4/14/2010	9:30-12:55	3.5	Digitek
4/15/2010	9:30-11:20	1.9	Digitek
4/15/2010	12:45-7:22	6.7	Digitek doc review,
4/16/2010	9:20-12:40	3.4	Digitek
4/16/2010	12:35-5:30	5	Digitek
4/19/2010	12:00-12:10	0.2	Email to Michael Anderton re deposition dates/times/ subpoenas
4/19/2010	6:18-6:28	0.2	Document review for Divya
4/19/2010	5:55-6:10	0.3	Digitek, email re listserv
4/19/2010	9:30-9:50	0.4	Email, catch up
4/19/2010	10:15-10:34	0.4	Talk to Pete re deposition schedule, who to re-depose, meeting with experts etc
4/19/2010	10:34-11:01	0.5	Figure out Cali-subpoena

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Digitek MDL Time

4/19/2010	1:42-2:35	0.9	Work on tolling agreements,
4/19/2010	4:15-5:47	1.6	Submit tolling agreements, serve notices, work on schedule/calendar for depositions
4/20/2010	12:56-1:00	0.1	MDL email
4/20/2010	9:45-12:04	2.4	Email defense counsel re tolling agreement, talk to sandy re depo schedule, etc
4/20/2010	3:00-7:40	4.7	Email defense counsel re schedule, Doc review
4/21/2010	9:40-12:24	2.8	Digitek, work on tolling agreement stuff and updating listserv, talk to Dave re MDL questions, email Defense Counsel re deposition dates, talk to Fred re tolling agreement and Spyglass billing
4/21/2010	1:36-7:22	6.8	Digitek, work on tolling agreement stuff, MDL emails and updating listserv, serve notices/subpoenas, talk to Fred re tolling agreement, update and send tolling agreement out to listserv, call spyglass re billing. Work on MDL to-do list, work on inspection protocol
4/22/2010	11:04-11:35	0.6	Read Rule 11 hearing order and email out, answer tolling questions. Talk
4/22/2010	12:05-12:48	0.8	Depo prep, Look over Klopping trial case, check on judge's ruling on Trial Cases (Gilmore & McCornack not ranked)
4/22/2010	9:30-10:43	1.3	Tolling, dig email etc
4/22/2010	2:08-8:29	6.4	Email to Matt, work on tolling agreement stuff, field calls re tolling agreement, email back and forth with Kimberly from Tucker Ellis, Deal with MDL people on tolling agreements, get them all formatted and complied and sent out.
4/23/2010	3:40-5:22	1.7	Digitek Tolling
4/23/2010	9:45-1:31	3.8	Digitek Tolling
4/25/2010	8:20-8:40	0.3	Figure out travel plans w/ Pete
4/26/2010	1:55-2:10	0.3	Tolling agreements
4/26/2010	8:00-9:00	1	Dinner with Pete (longer but talked about the case approximately a hour)
4/26/2010	9:40-12:21	2.7	Email, catch up, tolling agreements, organization,
4/26/2010	2:10-6:30	4.4	Travel
4/27/2010	8:00-8:45	0.8	Digitek – review docs

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Digitek MDL Time

4/27/2010	9:00-9:50	0.9	Breakfast – discuss expert
4/27/2010	3:15-6:45	3.5	Travel
4/27/2010	9:50- 3:15	5.5	Meet with Expert
4/28/2010	12:19-12:48	0.5	Email Defendants, Fletch & Golkow about deposition, doc review
4/28/2010	11:31-12:12	0.7	Docs for Deposition – prepare, talk to Pete, Talk to Fred,
4/28/2010	9:35-11:15	1.7	Digitek
4/28/2010	1:30-3:45	2.3	Doc review etc
4/28/2010	4:08- 7:14	3.1	Tolling agreement stuff, doc review etc
4/29/2010	9:00-10:15	1.3	Prep for depo/document review
4/29/2010	9:50-12:10	2.4	Prep for depo
4/29/2010	4:20-8:00	3.7	Prep for depo/document review
4/29/2010	12:10-4:20	4.2	Travel to NYC
4/30/2010	5:20-12:45	7.5	Travel
4/30/2010	8:00-5:20	9.4	Prep and Divya Patel's deposition
5/3/2010	5:58-6:05	0.2	Digitek – respond to emails and reserve conference room
5/3/2010	9:30-12:35	3.1	Doc review/ scheduling meetings with experts/ getting corrected notices done and filed
5/3/2010	1:40-5:50	4.2	Email with Kristen re multiple filings
5/4/2010	9:30-11:40	2.2	Prep for depositions etc
5/4/2010	1:40-7:15	5.6	Prep for depositions etc
5/5/2010	11:30-12:00	0.5	Go through docs for depo
5/5/2010	5:15-9:45	4.5	Travel
5/5/2010	11:00-11:15	12.3	Prep for depo, 3:00 call w/ Dr. Nelson & Pete, Meet with Spyglass guys (including dinner)
5/6/2010	12:00-1:00	1	Go through docs for depo
5/6/2010	10:30-1:40	3.2	Depo (left early)
5/6/2010	7:00-10:30	3.5	Prep for depo – talk to Fred etc
5/6/2010	1:40-8:30	6.9	Travel
5/7/2010	9:40-10:25	0.8	Emails and meet with Fred & Carmen re experts
5/7/2010	10:30-12:30	2	Digitek
5/7/2010	2:00-6:00	4	Digitek

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Digitek MDL Time

5/8/2010	2:00-5:00	3	Doc review etc for depositions
5/10/2010	5:07-5:15	0.2	Emails
5/10/2010	3:55-4:50	1	Digitek – prep for dep doc review etc
5/10/2010	9:00-10:30	1.5	Prep for depos and get stuff together
5/10/2010	6:40-11:00	4.4	Document review
5/10/2010	10:30-3:30	5	Travel
5/11/2010	7:30-8:30	1	Prep for depo
5/11/2010	8:30-3:00	6.5	Deposition (Eric Cardona)
5/11/2010	3:00-11:00	8	Prep for Somma's meeting – meet with Somma & Pete , Dinner with Somma & Pete
5/12/2010	7:30-8:30	1	Prep for depo
5/12/2010	4:15-6:30	2.3	Digitek – doc review etc
5/12/2010	6:30-10:00	3.5	Dinner with Hunter
5/12/2010	8:30-4:15	7.8	Deposition (Michael Ponzo)
5/13/2010	7:30-8:30	1	Prep for Depo
5/13/2010	8:00-10:30	2.5	Doc review
5/13/2010	8:30-5:00	8.5	Deposition (Brian Nizio)
5/14/2010	7:30-8:30	1	Doc review
5/14/2010	8:30-1:15	4.8	Deposition – Ashesh Dave
5/14/2010	1:15-7:10	6	Travel
5/16/2010	10:00-11:30	1.5	Doc review
5/16/2010	2:30-4:30	2	Doc review
5/17/2010	10:00-12:00	2	Depo prep / doc review
5/17/2010	8:30-11:20	2.9	Doc review prep for depo
5/17/2010	11:45-4:00	4.3	Travel
5/17/2010	4:00-9:30	5.5	Depo prep/ doc review
5/18/2010	12:00-1:30	1.5	Prep /doc review
5/18/2010	5:30-9:00	3.5	Prep/ doc review
5/18/2010	9:00-12:30	3.5	Depo (operator depo)
5/18/2010	12:30-5:20	4.9	Travel
5/19/2010	9:25-9:33	0.2	Email – depo logistics

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Digitek MDL Time

5/19/2010	10:43-10:52	0.2	Emails
5/19/2010	2:15-6:45	4.5	Depo prep & doc review
5/20/2010	9:30-12:15	2.8	Digitek – doc review & depo preop
5/20/2010	9:00-12:15	3.3	Doc review / depo prep
5/20/2010	1:00-7:30	6.5	Travel
5/21/2010	7:00-7:40	0.7	Emails
5/21/2010	5:00-9:00	4	Depo prep and travel to depo w/ Carl from PA to WV
5/21/2010	9:00-1:45	4.8	Depo (Chuck Koon – left early)
5/21/2010	1:45-7:00	5.3	Travel (with Carl back to Pa then plane)
5/24/2010	9:30-11:30	2	Dinner w/ Ed, Pete & Sofia
5/24/2010	9:30-12:00	2.5	Get ready for trip
5/24/2010	12:30-9:30	9	Travel
5/25/2010	8:30-10:30	2	Dinner w/ Ed, Pete & Sofia
5/25/2010	9:00-8:30	11.5	Depo prep, Digitek emails and deposition
5/26/2010	8:00-6:00	10	Travel
5/27/2010	5:53-7:04	1.2	Organization , email expert etc
5/27/2010	9:40-12:41	3.1	Digitek – catching up on emails, organization etc
5/27/2010	1:40-5:47	4.2	Talk to Fred, call quantc/parexel lawyers, talk to Sofia, talk to Pete, Talk to Cyndi (trial case), email experts, email class action group, email letter re inspection, talk to Dave Wilharm re subpoenas
5/28/2010	12:25-1:20	1	Talk to Carl, talk to Marissa re conference room for expert meeting
5/28/2010	2:00 – 5:20	3.4	Work on meeting room, response to inspection letter , talk to fred re letter, organization etc
5/28/2010	8:40-12:08	3.5	Get ready for call with Dr. Nelson, Talk to Dr. Nelson w/ Pete, catch tail-end of class call with Fred, talk to Fred re digitek, talk to Quantic lawyer, talk to Richard Dean,
6/1/2010	8:48-12:01	3.3	Digitek, call with Pete & Dr. Nelson, talk to Fred re experts and schedule, email pete
6/1/2010	12:52-6:54	6.1	Digitek, call with defendants, talk to Fred, talk with Carmen re expert reports, work on organization and expert reports etc
6/2/2010	12:30-3:30	3	Meet with expert

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Digitek MDL Time

6/2/2010	3:30-7:00	3.5	Travel
6/2/2010	6:00-12:30	6.5	Travel
6/3/2010	6:30-7:00	0.5	Look over expert reports
6/3/2010	6:30-7:30	1	Look over expert reports
6/3/2010	7:30-9:30	2	Dinner w/ Pete – discuss inspection etc
6/3/2010	7:30-9:30	2	Dinner w/ Pete – discuss inspection etc
6/3/2010	7:00-5:00	10	Plant inspection, breakfast and lunch with expert
6/4/2010	5:00-5:15	0.3	Talk to dr. Nelson
6/4/2010	7:00-11:45	4.8	Expert reports & meetings
6/4/2010	11:45-5:00	5.3	Travel
6/5/2010	5:15-5:25	0.2	expert reports
6/5/2010	11:30-12:30	1	expert reports
6/5/2010	8:00-9:00	1	expert reports
6/5/2010	9:00-10:30	1.5	expert reports
6/5/2010	3:00-4:30	1.5	expert reports
6/7/2010	9:30-1:16	3.8	Email, look over expert stuff,
6/7/2010	3:00-7:19	4.4	expert review
6/8/2010	8:20-8:30	0.2	Digitek
6/8/2010	7:30-8:30	1	Digitek
6/8/2010	5:00-7:00	2	Digitek
6/8/2010	8:30-4:00	7.5	Travel to Savanna, meet w/ Farley, travel back to office
6/9/2010	11:00-11:06	0.1	Email w/ expert
6/9/2010	9:25-9:40	0.3	Digitek
6/10/2010	9:30-10:00	0.5	MDL email
6/10/2010	9:00-10:00	1	Digitek expert – read reports
6/10/2010	2:04-4:30	2.5	Digitek expert
6/10/2010	5:30-8:00	2.5	Digitek expert
6/10/2010	10:02-12:55	2.9	Expert report
6/11/2010	11:15-11:18	0.1	Email Expert
6/11/2010	5:51-6:15	0.4	Digitek expert report review
6/11/2010	1:04-2:35	1.6	Digitek expert report review

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Digitek MDL Time

6/11/2010	2:40-5:15	1.6	Digitek expert report review, talk to Dr. Frank etc
6/11/2010	8:00-10:00	2	Expert reports
6/11/2010	9:20-12:05	2.8	Digitek expert report review
6/12/2010	3:20-3:35	0.1	Email/ expert reports
6/12/2010	10:30-1:00	2.5	Expert reports, talk to mark on phone
6/13/2010	1:45-2:05	0.4	Email and expert reports
6/14/2010	8:10-9:00	0.9	Email and expert reports
6/14/2010	11:00-12:00	1	Email and expert reports
6/14/2010	1:30-8:34	7.1	Email and expert reports
6/15/2010	8:20-8:22	0.1	Email
6/15/2010	12:00-12:30	0.5	Email and expert reports
6/15/2010	7:00-8:20	1.4	Email and expert reports
6/15/2010	3:55-5:30	1.6	Expert reports
6/15/2010	8:27-10:30	2.1	Email and expert reports
6/16/2010	3:37-3:41	0.1	Email Jim Pettit etc
6/21/2010	12:28-12:30	0.1	Email
6/21/2010	3:43-3:56	0.3	Email
6/21/2010	4:30-5:22	0.9	Email
6/21/2010	8:50-10:40	1.7	Email
6/22/2010	9:00-12:45	3.8	Digitek, depo prep
6/22/2010	1:50-10:00	8.2	Travel
6/23/2010	6:45-9:30	2.8	Depo prep- meet with Dr. Semigran
6/23/2010	9:30-3:30	6	Depo and meeting with Dr. Semigran after depo
6/23/2010	3:30-12:30	9	Travel
6/24/2010	11:16-1:00	1.8	
6/24/2010	2:15-7:30	5.3	Prep for expert depositions
6/25/2010	1:45-2:40	1	
6/25/2010	2:58-5:35	2.7	Digitek
6/25/2010	9:15-12:20	3.1	
6/27/2010	3:50-3:58	0.2	Email experts
6/28/2010	9:30-11:00	1.5	Review docs

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Digitek MDL Time

6/28/2010	3:15-8:45	5.5	Depo Prep with Kenny
6/28/2010	6:55-3:10	8.3	Prepare for depo and Travel to Newark
6/29/2010	6:15-8:30	2.3	Depo prep
6/29/2010	5:40-8:00	2.4	Talk to Expert Kenny, talk to Expert Frank with Fred and Pete
6/29/2010	8:30-5:40	8.2	Depo (Mark Kenny)
6/30/2010	9:00-3:00	6	Depo prep/document review
6/30/2010	3:00-11:00	8	Depo Prep
7/1/2010	6:55-8:30	1.6	Depo Prep
7/1/2010	8:30-4:30	8	Depo (Somma)
7/1/2010	4:30-1:10	8.7	Travel
7/2/2010	9:45-12:00	1.3	Talk to Fred, talk to Carmen, email NJ guys re experts, talk to Pete, email transcript
7/2/2010	3:45-5:00	1.3	Mdl
7/2/2010	1:20-3:25	2.1	Digitek MDL
7/6/2010	12:00-12:36	0.6	Email defendants, email expert, talk to Fred
7/6/2010	5:45 – 6:16	0.6	Work on Defendants exhibit list.
7/6/2010	9:30-11:30	2	Email, organization etc
7/6/2010	3:15-5:40	2.5	Work on Defendant's exhibit list, download exhibits, upload docs to Crivella West
7/7/2010	11:50-11:55	0.1	Email to Avril
7/7/2010	9:46-9:55	0.2	Email for MDL
7/7/2010	10:50-11:20	0.5	Talk with Fred and Carl
7/7/2010	1:40-2:30	0.9	MDL stuff, call w/ Fred & Carl, scheduling for Bliesner, email pete, etc.
7/8/2010	12:45-12:55	0.2	Digitek
7/8/2010	10:25 -10:40	0.3	MDL – prepare for deposition
7/8/2010	6:02-6:25	0.4	Mdl
7/8/2010	4:22-5:20	1	Digitek – look over Defendants exhibits
7/8/2010	2:52-3:53	1.1	Digitek – Bliesner
7/9/2010	9:45-12:15	2.5	Digitek
7/9/2010	1:45-5:10	3.5	Digitek

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Digitek MDL Time

7/12/2010	9:30-12:25	3	Email, organization etc, talk with Hunter, talk with Harry, email Somma, email Fred
7/12/2010	1:25-6:25	5	Go over expert depositions & exhibits, check repository, look over renillo invoices, talk to Pete, email Lead, talk to Pete, talk to Carl,
7/13/2010	1:30-1:55	0.5	Digitek MDL
7/13/2010	2:54 – 3:33	0.7	Looking over depositions, talking to Carl, looking up elements of causes of action,
7/13/2010	9:45-12:25	2.7	Talk with Fred, read over depositions, talk with Carl, call Jimmi Williamson's office
7/13/2010	3:36-6:26	2.9	Documents, deposition review etc, respond to emails re document kiosk, go through defendants exhibits (identifying etc),
7/14/2010	5:45-6:32	0.9	Digitek
7/15/2010	5:25-5:29	0.1	Digitek emails and invoices
7/15/2010	5:52-5:57	0.1	Talk to Fred re PSC email
7/15/2010	4:12 – 4:21	0.2	Digitek – go over Fred's letter to the PSC
7/15/2010	12:28-12:46	0.3	Digitek
7/15/2010	2:49-3:21	0.6	Digitek, talk to Pete, talk to Fred
7/15/2010	9:30-10:41	1.2	Digitek
7/16/2010	10:00-10:15	0.3	Digitek Talk to Fred
7/16/2010	5:30-6:11	0.7	Digitek – send expert reports to Holly, email to Oklahoma guys, email to Matt re tolling
7/19/2010	11:16-11:24	0.2	Talk to Marissa re expenses & PSC accounting
7/19/2010	11:46-11:55	0.2	Talk to Fred and/or Marissa re Digitek
7/19/2010	2:06-3:33	1.5	Digitek - email Avril re tolling ,
7/20/2010	3:20-3:30	0.2	Digitek emails
7/20/2010	2:30-3:12	0.7	Digitek, email Fred, talk to Marissa, Call Carl
7/20/2010	9:15-10:15	1	Digitek
7/20/2010	3:30 – 9:56	6.5	Travel
7/21/2010	7:45-9:00	1.3	Meet before meeting
7/21/2010	9:00-3:00	6	Meeting
7/21/2010	3:00-10:35	7.6	Travel

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Digitek MDL Time

7/22/2010	2:25-2:27	0.1	Digitek
7/22/2010	3:55-4:00	0.1	Talk to Ryan from Oklahoma Digitek case
7/22/2010	10:45-11:03	0.3	Digitek MDL
7/22/2010	6:22-6:56	0.6	Digitek researching Frye and Daubert
7/22/2010	1:28-2:17	0.9	Digitek
7/23/2010	11:53-12:04	0.2	Work on criteria
7/23/2010	9:30-10:45	1.3	Look over settlement criteria and discuss with Carmen and Fred
7/23/2010	1:55-4:35	2.7	Digitek email and work on criteria
7/26/2010	9:55-10:00	0.1	Talk to Marissa re Digitek
7/26/2010	5:54-6:00	0.1	Digitek – talk to Fred
7/26/2010	11:28-11:40	0.2	Talk to Mark Kenny
7/26/2010	9:30-9:45	0.3	Email and get messages
7/26/2010	11:40-11:53	0.3	Digitek – Settlement
7/26/2010	2:00-2:30	0.5	Research
7/26/2010	4:31-5:39	1.2	Digitek- settlement
7/26/2010	10:06-11:28	1.4	Work on point system
7/26/2010	2:55-4:17	1.4	Digitek – settlement
7/27/2010	3:08-3:15	0.2	Talk to Fred
7/27/2010	10:12-10:32	0.4	Talk to Carl
7/28/2010	2:31-2:36	0.1	Digitek MDL get stuff together for trip.
7/28/2010	11:49-12:00	0.2	Digitek MDL – email with Shamus
7/28/2010	1:59-2:10	0.2	Talk to Carl
7/28/2010	12:35-12:58	0.4	Digitek – MDL
7/28/2010	3:25-12:35	9.2	Travel
7/29/2010	9:00-2:15	5.3	Meeting re MDL settlement
7/29/2010	2:15-8:45	6.5	Travel
7/30/2010	5:41-6:15	0.6	Digitek – legal research
7/30/2010	4:02-5:35	1.6	Digitek – legal research
7/30/2010	2:10-3:50	1.7	Digitek legal research, talk to Carmen, talk to mitch
7/30/2010	9:26-1:04	3.7	Digitek – legal research
8/2/2010	2:12-2:20	0.2	Phone /email

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Digitek MDL Time

8/2/2010	9:45-10:20	0.6	Email re experts, talk to Pete, talk to Fred
8/2/2010	10:35-12:31	1.9	Call w/ Fred & Pete, talk to Fred re settlement , legal research
8/2/2010	2:35-6:59	4.4	Legal research, talk to Fred, talk to Shamus, talk to Fred, legal research
8/3/2010	11:41-12:05	0.4	MDL work, talk to Carmen about the settlement agreement
8/3/2010	9:45-11:15	1.5	Go over settlement agreement, email Carmen, email Garretson firm
8/3/2010	2:20-6:15	4	Digitek MDL, talk to Fred, email Harry, look over Matt's term sheet, legal research, call w/ Denise and Marissa re expenses/bills (also talked to Debbie & Harry for a minute), talk to Chris Van de Kieft re mdl questions. Talk to Carl
8/4/2010	9:45-10:15	0.5	Talk to Fred, get #'s together etc
8/4/2010	12:10-1:14	1.1	MDL – going over expenses etc, emailing harry, talking to Marissa, email Matt, read over letter from defendants, respond to matt's email, email with Crivella west re Oklahoma and MDL lawyers getting access/training, email harr & co, talk to Fred re Matt's letter, and outstanding emails.
8/4/2010	2:00-11:06	9.1	Travel
8/5/2010	11:00-12:10	1.2	Meet w/ Judge Goodwin and Defendants, talk with Harry, Carl and Fred
8/5/2010	12:10-1:20	1.2	Lunch w/ Carl and Fred – discuss settlement more in depth
8/5/2010	8:45-11:00	2.3	Meet w/ Fred & Carl before meeting.
8/5/2010	1:20-12:45	11.5	Travel
8/6/2010	2:50-2:52	0.1	Email re pfs
8/6/2010	11:00-11:08	0.2	talk to Carmen re moving garretson call and what happened yesterday
8/6/2010	1:50-2:00	0.2	Get ready for call
8/6/2010	12:05-12:32	0.5	Talk to Carl re settlement
8/6/2010	10:00-10:40	0.7	Working on settlement agreement
8/6/2010	3:00-3:38	0.7	Digitek MDL
8/6/2010	2:00-2:44	0.8	Call w/ Garretson people, Fred & Carmen
8/6/2010	11:17-12:05	0.9	Working on settlement agreement
8/6/2010	12:38-1:35	1	Settlement agreement , talk to Defendants

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Digitek MDL Time

8/6/2010	4:03-6:30	2.5	Work on settlement agreement
8/7/2010	10:49-10:52	0.25	Talk to Fred
8/7/2010	12:03-12:53	0.9	Work on settlement agreement and email out.
8/9/2010	5:19-5:21	0.1	Email w/ Fred
8/9/2010	5:01-5:11	0.2	Respond to Fred's email
8/9/2010	9:35-10:20	0.8	Email
8/9/2010	2:00-3:01	1.1	Email Harry, Fred & Carl, email Fred re contacting people, talk to Marissa, look over dates, email pete, talk to Pete
8/10/2010	10:08-10:10	0.1	Email Matt
8/10/2010	10:22-10:27	0.1	Call Harry, talk to Debbie
8/10/2010	10:00-10:08	0.2	talk to Fred
8/10/2010	10:10-10:22	0.2	Talk to Carl
8/10/2010	2:00-2:10	0.2	Get ready for trip
8/10/2010	2:10-2:27	0.2	Talk to Terry Kilpatrick from Don Ernst's office
8/10/2010	9:40-10:00	0.4	MDL
8/10/2010	1:00-1:22	0.4	MDL, talk to Harry, Talk to Cyndi
8/10/2010	2:27-8:15	5.9	Travel
8/11/2010	8:50-3:15	6.5	Meeting w/ Defendants with Carl & Fred (also called and talked to Judge Goodwin w/ group)
8/11/2010	3:15-11:10	8	Travel
8/12/2010	1:04-1:52	0.9	Uploading/updating exhibit list and crivella west
8/12/2010	9:40-12:03	2.4	MDL, go through email, read letter, talk to Fred and respond to Matt's email, talk to Nancy Potter re deposition transcripts. Email re usernames/passwords/ updating /uploading to Crivella West
8/12/2010	1:58-6:48	4.9	Working on tolling agreements stuff, PSC meeting planning, uploading to Crivella West, updating exhibit chart
8/13/2010	4:37-4:48	0.2	Talk to Carl about settlement agreement
8/13/2010	4:48-4:55	0.2	Email Jackly re draft, email co-leads
8/13/2010	1:25-2:15	0.9	Upload to Crivella West
8/13/2010	3:35-4:37	1.1	Look over state counsel chart, print out settlement agreement and talk to Fred

8/13/2010	9:30-12:12	2.7	Email matt, try and figure out PSC meeting, work on Crivella West, talk to Cyndi Rusnak (11:35-11:42) re Vega case, talk to Fred about PSC meeting, go over email re PSC meeting
8/16/2010	8:45-9:25	0.7	Prepare for call/read over settlement agreement
8/16/2010	9:30-10:10	0.7	Call w/ Fred & Carl
8/16/2010	10:10-10:55	0.8	Call w/ Defendants and Fred and Carl
8/16/2010	10:55-12:25	1.5	Digitek – read over email and look up settlement provisions
8/16/2010	1:20-4:29	3.2	Settlement, talk to Carmen, read over Garretson information, email Garretson information to Defendants and co-leads, work on some changes and email to Jackie, talk to Fred (or try to)
8/17/2010	8:47-9:25	0.7	Prepare for call/ call w/ Matt, Carl & Fred
8/17/2010	9:25-1:06	3.7	Work on state chart, PSC meeting plans, try to call Carl, email Carl, PSC meeting details, talk to Carl re grid values, work on/read over draft,
8/17/2010	1:58-7:17	5.4	work on state case chart,
8/18/2010	9:03-11:10	1.9	Settlement stuff
8/18/2010	7:45-9:40	2	Dinner w/ Fred, Carl & Pete
8/18/2010	11:10-6:15	7.1	Travel
8/19/2010	8:30-1:50	5.4	PSC meeting
8/19/2010	1:50-10:40	8.9	Travel
8/20/2010	1:17-1:19	0.1	MDL email
8/20/2010	3:10-3:25	0.3	MDL, respond to email, send out email to Harry, Carl and Fred
8/20/2010	4:38-5:13	0.6	Talk to Brad Miller, email re MDL
8/20/2010	9:28-12:18	2.9	MDL stuff, call w/ Carl, Fred & Matt (20 min)
8/23/2010	11:15-11:28	0.3	MDL
8/23/2010	9:40-10:00	0.4	Talk to Carl, email, call Fred re meeting later today
8/23/2010	2:00-4:10	2.2	Call w/ Harry, Carl, Fred and Defendants
8/23/2010	11:36-2:00	2.4	Read over settlement information, call w/ Harry, call w/ Matt (1:00-1:10), call with Harry, Carl and Fred (1:10-1:55), get ready for call w/ Def
8/24/2010	10:02-11:10	1.2	MDL, email
8/24/2010	11:45-1:05	1.4	Go over letter with Fred, updating listserv list,

8/24/2010	1:46-3:39	1.9	updating listserv
8/24/2010	3:52-6:57	3.1	Work on settlement stuff
8/25/2010	7:52-8:00	0.2	Work on settlement stuff
8/25/2010	10:58-1:06	1.2	Work on settlement stuff
8/25/2010	7:40-9:00	1.4	Settlement stuff
8/25/2010	9:00-10:58	2	Call w/ Defendants re settlement agreement
8/25/2010	2:10-7:18	5.2	Work on settlement stuff (working on claim form), work on term sheet for call etc
8/26/2010	5:50-5:54	0.1	MDL email
8/26/2010	1:52-2:10	0.3	Talk to Jackie and ask Marissa about alternate email address
8/26/2010	4:41-5:10	0.5	Respond to email
8/26/2010	11:10-1:05	2	Digitek
8/26/2010	8:40-11:01	2.4	Get ready for today's call, work on term sheet/agenda/ respond to MDL emails
8/27/2010	10:04-10:08	0.1	Respond to Matt's email
8/27/2010	1:45-1:51	0.1	Digitek email
8/27/2010	2:20-2:41	0.4	Look over settlement agreement changes and forward on
8/29/2010	2:50-3:04	0.3	MDL email
8/30/2010	6:17-6:21	0.1	Digitek MDL
8/30/2010	9:30-9:55	0.5	MDL email
8/30/2010	12:20-1:20	1	MDL – Go over Settlement agreement, respond to MDL emails, talk to Avril Love
8/30/2010	4:10-5:15	1.1	Work on settlement agreement
8/30/2010	1:31-4:04	2.6	Go over settlement agreement
8/31/2010	1:05-2:47	1.8	Work on settlement agreement
8/31/2010	9:00-10:50	1.9	Work on settlement agreement
8/31/2010	11:01-12:50	1.9	Work on settlement agreement, draft motion & order re appointing special master

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Digitek MDL Time

8/31/2010	3:38-6:58	3.4	Work on settlement agreement, talk to Dr. Semigran, discuss point values w/ Carmen, Discuss Medicare issues with Fred, Call w/ Defendants (4:00-5:20), talk to Carmen and Fred about grid values & point max
9/1/2010	2:40-6:00	3.4	Settlement Agreement /MDL sutf
9/1/2010	8:10-1:47	5.7	Settlement Agreement, look over agreement, call with Defendants, talk to Jackie, MDL Emails
9/2/2010	12:22-12:32	0.2	MDL
9/2/2010	7:00-7:13	0.3	Digitek MDL - Email
9/2/2010	5:30-6:09	0.7	Digitek MDL – work on agreement – talk to Fred & Matt re Mylan’s change
9/2/2010	2:10-2:57	0.9	Digitek MDL – getting settlement agreement pages correct and combining signatures.
9/2/2010	3:20-4:40	1.4	Digitek MDL, work on agreement, talk to Fred & Matt
9/3/2010	9:20-12:20	3	Digitek MDL - distributing settlement agreement per PTO
9/7/2010	10:07-10:10	0.1	Email re letter explaining settlement
9/7/2010	1:52-2:08	0.3	Work on letter, return emails
9/7/2010	9:00-9:20	0.4	In house- talk to Michelle
9/7/2010	2:17-2:41	0.4	Work on letter, return emails
9/7/2010	9:20-9:50	0.5	MDL emails
9/7/2010	5:40-6:12	0.6	Prepare for travel to see special master
9/7/2010	12:50-1:43	0.9	Update listserv (with removals/incorrect addresses)
9/7/2010	11:32-12:30	1	Work on letter, return emails
9/7/2010	10:18-11:27	1.2	MDL – Email, look over letters, talk to Jackie re “interested parties” and Spec. Master protocol
9/8/2010	12:31-12:40	0.2	MDL – emails
9/8/2010	1:05-1:20	0.3	MDL – emails
9/8/2010	1:29-1:50	0.4	MDL emails
9/8/2010	4:55-5:25	0.5	Talk to Marissa re baker, talk to Carl (15 min), talk to
9/8/2010	5:10-12:10	7	Travel
9/9/2010	5:59-6:15	0.3	Respond to MDL email, send Prof. Baker’s comments to Matt.

9/9/2010	9:45-10:06	0.4	Talk to Marissa then Fred re Lynn Baker
9/9/2010	3:33-4:00	0.5	Vetting
9/9/2010	10:40-11:31	0.9	MDL email, looking over letters, lookover email from Dr. Baker, talk to Fred re email from Prof. Baker, respond to Prof. Baker's email
9/10/2010	2:55-3:50	1	MDL –talk to callers (Chris Van de Kief, David Kuttles), send out email to listserv, update listserv etc, answer MDL email,
9/10/2010	10:58-12:05	1.2	MDL email/ email tolling agreement to Matt, talk to Pete, talk to Fred about letter to MDL, Pete's philly cases
9/13/2010	9:59-10:03	0.1	Matt's Email etc
9/13/2010	4:14-4:20	0.1	Print & save defendants motions
9/13/2010	9:35-9:45	0.2	Go Through email, talk to Marissa about Prof. Baker's letter
9/13/2010	4:43-5:39	1	Read defendants motions , email co-leads
9/13/2010	1:47-3:00	1.3	Going over Prof. Baker's letter, looking over equivalent viox stuff
9/14/2010	1:36-2:00	0.4	Work on letter
9/14/2010	11:14-12:31	1.3	Making redline changes to description and letters.
9/14/2010	9:30-11:10	1.7	Reading over letters and conference call w/ Prof. Baker, Ed and Fred
9/14/2010	2:45-6:48	4.1	Work on letter, background information, settlement description, email w/ Lynn Baker
9/15/2010	8:40-8:44	0.1	Email w/ Lynn
9/15/2010	6:18-6:21	0.1	MDL emails
9/15/2010	6:30-6:32	0.1	MDL email
9/15/2010	12:26-12:33	0.2	Email with Matt Moriarty
9/15/2010	10:36-11:10	0.6	Read over settlement description and letter
9/15/2010	9:30-10:36	1.1	Read over settlement description and letter
9/15/2010	1:35-3:10	1.6	Send email re call w/ Prof Baker, send email to Libby re Garretson, email terry back about motion, talk to Mitch about motion, respond to MDL email.
9/15/2010	4:01-5:44	1.8	MDL – finalize description and letters, email out to various plaintiffs groups. Talk to Dave Peterson and Stacy about their cases.
9/17/2010	11:50-11:55	0.1	MDL – getting access for Oklahoma people

9/17/2010	3:50-3:55	0.1	Talk to Nancy Potter (def counsel for hosp in Oklahoma about copies of docs)
9/17/2010	6:03-6:07	0.1	Email to Stacy Hauer -
9/17/2010	12:10-12:40	0.5	MDL
9/17/2010	11:00-11:45	0.8	MDL, talk to Shamus, email Matt & Richard, email David Kuttles
9/17/2010	1:48-2:40	0.9	MDL – talk to Matt, call Oklahoma people
9/20/2010	4:02-4:05	0.1	MDL, respond to Jackie's email, forward to Fred & Carl
9/20/2010	4:07-4:09	0.1	MDL email
9/20/2010	6:41-6:44	0.1	Email from MDL person
9/20/2010	1:38-3:51	2.3	Emails, talking to Fred, organization etc
9/20/2010	9:45-12:18	2.6	Going through email for MDL, organizing etc
9/21/2010	3:30-3:33	0.1	MDL Email
9/21/2010	11:00-11:07	0.2	MDL emails
9/21/2010	2:15-2:25	0.2	Talk to mitch re motion and pto # 65
9/22/2010	2:06-2:08	0.1	Email to Brooke
9/22/2010	10:30-10:37	0.2	Mdl emails
9/22/2010	2:55-3:02	0.2	Respond to MDL email
9/22/2010	11:45-12:05	0.4	
9/22/2010	9:45-10:13	0.5	MDL
9/22/2010	12:53-1:33	0.7	MDL , get ready for call, call w/ special master
9/23/2010	6:53-6:55	0.1	Email Matt
9/23/2010	4:30-5:02	0.6	MDL
9/23/2010	2:30-3:09	0.7	MDL
9/23/2010	10:10-11:13	1.1	MDL
9/24/2010	11:39-11:41	0.1	Talk to Marissa re message
9/24/2010	7:55-11:05	3.2	MDL
9/27/2010	11:55-12:00	0.1	Respond to tolling email and answer question re experts/affidavits
9/27/2010	1:26-1:32	0.1	Respond to Bryan Fitts email
9/27/2010	3:28-3:41	0.3	MDL emails (pill testing etc)
9/27/2010	9:40-10:50	1.2	Going through email for MDL, organizing etc
9/28/2010	1:36-1:38	0.1	MDL email

9/28/2010	3:27-3:35	0.2	Talk to MDL person calling about pill testing.
9/28/2010	4:17-5:19	1.1	MDL , return phone calls, talk to Terry Kilpatrick. Mr. Hall, Mr. Newsome, Pat Avery re tolled/Pro se person.
9/28/2010	10:13-11:56	1.8	MDL, email back Cyndi, email Garretson, talk to April from Cloon law firm, return other MDL emails, Email back Sal re unfiled case.
9/29/2010	5:07-5:09	0.1	MDL – call Michael Goertz – left a message.
9/29/2010	6:00-6:04	0.1	Talk to Michael Goertz
9/29/2010	3:07-3:14	0.2	Read M.Goertz email and email fred then speak with Tom Arbon and email opt-in/out and claim form to him.
9/29/2010	1:20-2:39	1.4	MDL, emails re tolled people, and email to pro se administrator person .
9/30/2010	12:25-12:28	0.1	Email tolling to Avril
9/30/2010	12:50-12:53	0.1	MDL email
9/30/2010	4:56-5:01	0.1	Look over fillable claim form and email to Jackie
9/30/2010	11:10-11:18	0.2	MDL – working on tolling agreement stuff
9/30/2010	5:25-5:35	0.2	Talked to Sam Fisher about opt-in/opt-out and cases that were not filed.
10/1/2010	11:15-11:19	0.1	MDL email
10/1/2010	10:30-10:52	0.4	Email Matt, email Spyglass
10/1/2010	2:09-2:46	0.7	MDL email
10/4/2010	10:17-10:27	0.2	Email back michael about tolling.
10/4/2010	1:35-1:54	0.4	MDL, email from Fred (looking up person), talk to Terry from Shelly's office, emailing back MDL emails and forwarding questions to co-leads
10/4/2010	9:40-10:05	0.5	Going through email for MDL, organizing etc
10/4/2010	4:37-5:09	0.6	MDL -
10/5/2010	9:53-9:58	0.1	Garrettson email
10/5/2010	10:44-10:49	0.1	MDL
10/5/2010	11:09-11:11	0.1	Send out call in #
10/5/2010	11:43-11:44	0.1	Pat avery email
10/5/2010	12:41-12:42	0.1	MDL email- sample letters

Meghan Carter, Motley Rice LLC

Digitek MDL Time

10/5/2010	12:45-12:48	0.1	Email/ add to listserv
10/5/2010	3:00-3:05	0.1	Talk to Carl
10/5/2010	4:50-4:51	0.1	MDL email
10/5/2010	3:55-4:00	0.2	MDL
10/5/2010	9:35-9:48	0.3	MDL
10/6/2010	10:00-10:04	0.1	MDL Email
10/6/2010	3:55-4:00	0.1	MDL email
10/6/2010	10:52-11:10	0.3	MDL email
10/7/2010	2:00-2:07	0.2	MDL emails
10/7/2010	4:32-5:15	0.8	Digitek MDL – catching up on emails
10/8/2010	4:09-4:12	0.1	Talk to Marissa re mailings for pro se cases
10/8/2010	9:25-9:40	0.3	MDL emails
10/8/2010	2:48-3:05	0.3	Digitek
10/8/2010	11:42-12:10	0.5	MDL – go over pro se clients, email Tom arbon etc
10/11/2010	5:15-5:23	0.2	Digitek – emailing back
10/11/2010	5:55-6:05	0.2	MDL email
10/12/2010	1:50-1:59	0.2	Talk to Larry Charfoos secretary
10/12/2010	5:55-6:11	0.3	Talk to Chris van de Kief confirm opt in forms.
10/12/2010	10:40-11:00	0.4	MDL
10/12/2010	4:30-5:14	0.8	MDL – emails, emailing Matt etc
10/13/2010	4:54-5:04	0.2	MDL – answer MDL questions (phone)
10/13/2010	11:57-12:19	0.4	MDL, talking to Larry Charfoos, responding to email.
10/13/2010	10:15-10:42	0.5	Digitek MDL, going over opt in forms and responding.
10/13/2010	1:58-2:25	0.5	MDL calls and emails
10/13/2010	4:20-4:51	0.6	MDL calls and emails
10/14/2010	3:10-3:16	0.2	MDL – email etc
10/14/2010	1:58-2:20	0.4	MDL – email / calls etc
10/14/2010	10:04-10:47	0.8	MDL, call back Hattie Phelps, respond to emails etc. leave Carl a message, talk to Carl about opt outs etc
10/15/2010	1:07-2:17	1.2	MDL- email/ phone calls
10/15/2010	5:35-7:04	1.5	MDL

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Digitek MDL Time

10/15/2010	9:30-12:05	2.6	MDL – email phone calls
10/15/2010	2:40-5:20	2.7	MDL
10/18/2010	9:32-9:35	0.1	Digitek – printing garrettson stuff
10/18/2010	12:52-1:02	0.2	Digitek
10/18/2010	2:30-2:37	0.2	Digitek
10/18/2010	9:30-10:00	0.5	Go over Dig opt in/outs with Marissa
10/18/2010	5:40-6:08	0.5	MDL – get ready for meeting with special master & Matt
10/18/2010	11:40-12:17	0.7	Opt outs
10/18/2010	8:05-8:48	0.8	MDL – get ready for meeting with special master & Matt, email T. Deacan, and respond to Dr. Semigran.
10/19/2010	8:00-10:30	2.5	Dinner w/ Fred & Carl and Defendants
10/19/2010	1:00-5:00	4	Prepare for meeting and meeting with Defe
10/19/2010	6:10-12:00	6	Travel
10/20/2010	9:30-10:50	1.4	Meeting w/ court etc
10/20/2010	8:00-9:30	1.5	Talk w/ Carl & Fred before meeting
10/20/2010	10:45-3:30	4.8	Travel
10/21/2010	12:55-12:58	0.1	Digitek questions
10/21/2010	1:50-1:55	0.1	Digitek questions
10/21/2010	5:17-5:23	0.1	Digitek – email Matt
10/21/2010	7:25-7:32	0.2	Digitek emails
10/22/2010	1:10-1:15	0.1	Digitek – email Angie
10/22/2010	12:00-12:50	0.9	Digitek – talk to Terry, talk to Angie, email Matt
10/26/2010	10:13-10:15	0.1	Digitek MDL
10/26/2010	2:00-2:05	0.1	Digitek MDL
11/15/2010	3:30-7:32	4.1	Catch up on emails, return calls, prepare for hearing
11/16/2010	7:40-8:50	1.2	Digitek, email and track down Fred
11/16/2010	10:40-12:22	1.7	Digitek – get ready for trip, talk to Carl & Matt
11/16/2010	6:30-8:15	1.8	Dinner with Carl
11/16/2010	12:22-6:00	5.7	Travel
11/17/2010	7:25-8:10	0.8	Talk to Fred & Pete re Digitek Hearing
11/17/2010	8:00-11:25	3.5	Prepare for hearing, hearing and talk to Plaintiffs afterwards

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Digitek MDL Time

11/17/2010	11:25-6:30	7.1	Travel
11/18/2010	2:01-2:05	0.1	Digitek MDL – read matt & Angie’s emails and PTO
11/18/2010	2:35-2:46	0.2	Digitek MDL
11/18/2010	1:00-1:23	0.4	Digitek MDL
11/18/2010	11:00-11:40	0.7	Digitek MDL
11/18/2010	11:47-12:40	0.9	Digitek MDL
11/19/2010	9:00-9:10	0.2	Digitek MDL
11/19/2010	1:00-1:16	0.3	Digitek MDL – email Matt
11/19/2010	10:30-11:00	0.5	Digitek MDL
11/19/2010	3:00-3:32	0.6	Digitek MDL
11/19/2010	11:50-12:34	0.8	Digitek MDL
11/22/2010	1:42-1:44	0.1	Digitek MDL email
11/22/2010	8:45-9:05	0.4	Read emails
11/22/2010	9:25-9:50	0.5	Respond to emails and speak with Matt
11/24/2010	10:00-11:30	1.5	Digitek MDL
11/29/2010	11:10-11:50	0.7	Digitek MDL
11/29/2010	9:35-10:55	1.4	Read emails – catch up on mdl emails, pull fee petition info
11/30/2010	2:02-2:04	0.1	MDL email
11/30/2010	10:45-10:53	0.2	Talk to Pete
12/1/2010	1:40-1:48	0.2	Email Pete and Matt
12/1/2010	11:35-12:00	0.5	MDL, emails, respond to Matt
12/1/2010	9:40-10:15	0.6	Digitek MDL
12/1/2010	10:40-11:15	0.6	Digitek MDL
12/1/2010	2:15-4:29	2.3	Talked to carl (2:15-2:31 & 3:04-3:10), go over cases still in the MDL, go over cases/emails of people that want in the settlement. Call back Todd Carson re Dr. Nelson’s invoice.
12/3/2010	12:46-12:50	0.1	Talk to Sandy re Golkow
12/3/2010	5:15-6:14	1	Doc review, check with Fred re extension on Ptal and sending transcripts to Texas. Work on Alpesh stuff for/with Holly.

12/3/2010	10:00-11:05	1.1	Go over MDL info w/ Sandy, get letters out re subpoenas & objections based on PTO # 27. email Michael Anderton re scheduling depositions. Talk to Dave, Holly and Sofia re documents for upcoming depositions.
12/3/2010	11:07-12:15	1.2	Go over MDL info w/ Sandy, get letters out re subpoenas & objections based on PTO # 27. email Michael Anderton re scheduling depositions. Talk to Dave, Holly and Sofia re documents for upcoming depositions.
12/3/2010	1:49-4:47	3	
12/4/2010	12:24-12:27	0.1	Doc review
12/4/2010	1:42-1:46	0.1	Email Matt Moriarty re Texas cases
12/4/2010	11:04-11:15	0.2	Digitek MDL administrative stuff
12/4/2010	11:30-11:38	0.2	Digitek MDL administrative stuff
12/4/2010	12:06-12:13	0.2	Doc review
12/4/2010	9:45-11:03	1.3	
12/4/2010	1:53- 4:58	3.1	Doc review, respond to MDL emails, talk to Fred (4:00-4:05), Talk to Sandy re getting ready for depositions (4:05-4:20)
12/4/2010	5:03-6:00	1	Doc review
12/6/2010	7:56-12:05	4.2	Doc review
12/7/2010	2:29-2:31	0.1	Digitek
12/7/2010	4:30-4:34	0.1	Email Nia re depositions
12/7/2010	2:15-2:27	0.2	Digitek
12/7/2010	4:38-4:47	0.2	Prepare for depositions
12/7/2010	7:12-7:22	0.2	Prepare for depositions
12/7/2010	5:40-5:57	0.3	Talk to Pete re MDL depositions
12/7/2010	4:51-5:32	0.7	Prepare for depositions/ document review; email Ed
12/7/2010	2:33-3:18	0.8	Respond to Harry, talk to Carl
12/7/2010	5:57-6:45	0.9	Email with Ed & Holly. Send email to NYC office to give heads up.
12/7/2010	9:50-10:50	1	Prepare for depositions
12/8/2010	8:20-8:30	0.2	
12/8/2010	8:30-8:47	0.3	Talk to David Wilharm

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Digitek MDL Time

12/8/2010	11:45-12:30	0.8	Prepare for dep
12/8/2010	9:00-10:15	1.3	Prepare for dep
12/8/2010	4:00-8:30	4.5	Prepare for dep
12/8/2010	10:15-3:00	4.8	Travel
12/9/2010	10:45-12:00	1.3	Prepare for dep
12/9/2010	7:40-9:30	1.9	Prepare for dep
12/9/2010	9:30-5:30	8	Deposition (technically ended at 4:34)
12/10/2010	9:00-10:15	1.3	Deposition (Deposition ended around 9:40)
12/10/2010	7:40-9:00	1.4	Prepare
12/10/2010	10:15-11:35	1.4	Meet w/ Ed, Pete & Holly
12/10/2010	12:40-7:35	7	Travel
12/11/2010	11:00-11:05	0.1	Talk to Fred
12/11/2010	12:21-1:05	0.3	
12/11/2010	11:45-12:10	0.5	Prepare for Depositions
12/11/2010	1:35-2:30	1	
12/11/2010	9:15-11:00	1.8	Prepare for Depositions
12/11/2010	3:50-5:36	1.8	
12/13/2010	6:15-7:15	1	Meet w/ Sofia & Ed
12/13/2010	10:30-12:00	1.5	Prepare for depo
12/13/2010	8:00-10:20	2.4	Prep for deposition, get documents ready for Fred
12/13/2010	3:00-6:00	3	Prep for deposition
12/13/2010	10:20-3:00	4.7	Travel
12/14/2010	4:00-5:00	1	Digitek
12/14/2010	10:00-11:00	1	Depo prep
12/14/2010	6:30-8:15	1.8	Prepare for depo,
12/14/2010	7:30-9:30	2	Dinner w/ Pete & Fred
12/14/2010	8:30-3:30	7	Terri Nataline Deposition
12/15/2010	6:50-9:00	2.2	Depo prep, breakfast with Fred then meet with Sofia, Fred, Pete and Shelly before deposition.
12/15/2010	6:20-12:00	5.7	Prep for Rick Dowling
12/15/2010	9:00-6:20	9.4	Deposition Swapn Roychowdhury

12/16/2010	12:00-1:25	1.5	Prep for Rick Dowling
12/16/2010	6:50-9:00	2.2	Prep for Rick Dowling
12/16/2010	9:00-6:15	9.3	Deposition
12/16/2010	7:00-9:00	2	Dinner with Fred & Shelly
12/17/2010	11:00-4:00	5	Digitek
12/17/2010	3:45-11:00	7.3	Travel to SC
12/18/2010	9:30-10:30	1	Digitek
12/18/2010	2:00-5:40	3.7	Digitek, including call w/ Defendants re self critical analysis privilege
12/21/2010	12:12-12:45	0.6	Digitek
12/21/2010	9:30-10:30	1	Digitek email etc
12/21/2010	4:12-5:45	1.6	Digitek
12/21/2010	1:45-5:50	4.1	Digitek
12/22/2010	11:16-11:30	0.3	Motion to compel
12/22/2010	11:38-12:16	0.7	Digitek
12/22/2010	1:15-4:46	3.6	Digitek
12/28/2010	4:41-4:46	0.1	Respond to Holly's email
12/28/2010	9:39-9:46	0.2	Email group re deposition dates
12/28/2010	11:30-11:40	0.2	Talk to Fred re call
12/28/2010	2:40-2:53	0.3	Email Holly re Defendants, Email Group re Apurva Patel, Talk to Carl re Call
12/28/2010	5:11-5:27	0.3	Respond to emails re MDL stuff
12/28/2010	1:55-2:40	0.8	Meet & Confer w/ Defendants, Talk to Fred re Digitek
12/28/2010	3:30-4:39	1.2	Digitek MDL
12/28/2010	9:46-11:00	1.3	
12/28/2010	3:02-4:30	1.5	Talk to Dave re Apurva Patel, Email Holly & Sofia, upload transcripts, look up local rules for motion to seal
12/29/2010	4:40-4:50	0.2	Email deadlines to Defendants email Richard Dean back about confidential docs
12/29/2010	3:08-4:29	1.4	Work on organizing MDL stuff, email Holly re motion to seal, talk to Holly (3:57-4:05), work on motion to seal, email holly, work on organizing

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Digitek MDL Time

12/29/2010	1:34-3:02	1.5	Get stuff ready to file for motion to compel on GMP audit; work on deadline chart, talk it over with Fred, email out to Trial Group, send out call time & # to expert call group
12/29/2010	4:55-6:39	1.8	Get motion to seal ready and get everything filed.
12/29/2010	10:03-12:24	2.4	Digitek – email Fred, Email Jim, talk to Sandy, email sofia & Holly, read over Motion to Compel and email minor changes/thoughts to Holly/Sofia, work on letter to Defendants re objections; look up local rules, prepare motion to seal and email to David; look over fred's deadline suggestions, talk to Fred,
12/30/2010	1:15-5:00	3.8	Digitek
12/30/2010	8:15-12:45	4.5	Digitek, call with defendants, re experts, call re depositions, talk to Fred about deadlines, email potential deadlines to Defendants
1/3/2011	5:45-5:52	0.2	MDL
1/3/2011	9:40-10:10	0.5	Go through emails etc
1/3/2011	1:30-2:15	0.8	MDL
1/3/2011	2:50-4:25	1.6	MDL
1/4/2011	6:11-6:23	0.2	MDL Email
1/4/2011	9:38-10:13	0.6	MDL - emails and talk to Expert
1/4/2011	12:40-1:16	0.6	MDL emails to withdraw opt outs and return emails .
1/5/2011	1:57-1:59	0.1	MDL Email
1/5/2011	9:43-9:57	0.3	MDL Email
1/5/2011	4:47-5:26	0.7	MDL Call
1/5/2011	3:00-4:10	1.2	MDL Call
1/6/2011	1:04-1:10	0.1	MDL Email - expert
1/6/2011	3:00-3:20	0.4	Talk to Jim Farley
1/6/2011	11:25-11:50	0.5	MDL Email
1/6/2011	3:38-4:15	0.7	Talked to Mark Kenny
1/7/2011	10:35-10:40	0.1	
1/7/2011	12:20-12:43	0.4	MDL - talk to Mark, Talk to Hunter, talk to Sam Fisher from Mississippi, email Garretson group
1/12/2011	1:05-1:12	0.2	MDL Motion

			Answer MDL questions, Work on motion for extension and send to Defendants, send lien language to Matt, email Libby at Garretson, talk to
1/12/2011	2:30-4:04	1.6	Holly re claim form, extra cases and fee affidavit.
1/13/2011	1:03-1:13	0.2	MDL , email Matt
1/13/2011	11:29-11:45	0.3	MDL
1/13/2011	9:50-10:31	0.7	MDL
1/14/2011	1:35-1:45	0.2	MDL
1/14/2011	11:45-12:25	0.7	MDL
1/14/2011	2:27-3:15	0.9	MDL
1/14/2011	4:10-5:26	1.3	MDL
1/21/2011	3:48 - 4:30	0.7	MDL
1/21/2011	11:00-12:20	1.4	MDL
1/26/2011	10:45-12:00	1.3	MDL (related to settlement)
12/6	10:30-11:15	0.8	MDL, emails with expert, email with special master & Matt, talk to MDL counsel re filing/clerk
12/7	3:00-5:00	2	Digitek MDL
12/7	8:30-2:30	6	Travel
12/9	1:40-1:45	0.1	Digitek MDL email
12/9	2:29-2:40	0.2	Talk to Carl
12/12	11:50-11:58	0.2	Email Jeannie, email co-leads about call, return Shamus email.
12/12	4:30-6:40	2.2	Attempted travel- at airport –flight cancelled
12/13	3:45-3:54	0.2	Digitek MDL
12/13	8:15-10:43	2.5	Special Master Training (listening on phone)
12/14	9:15-11:45	2.5	Digitek MDL – call with co-leads
12/15	10:40-10:47	0.2	Emails
12/15	12:30-12:47	0.3	Digitek MDL emails.
12/15	2:09-2:45	0.6	Digitek MDL emails
12/15	4:30-5:14	0.8	Digitek MDL, email Defendants, email about claim form question, email about deposition transcripts.
12/16	9:48-10:50	1.1	Digitek MDL emails

12/16	2:10-4:11	2.1	Emails, talk to Fred, Talk to Matt, Talk to Carl, talk to Terry (at Shelly's office)
12/28	9:30-10:45	1.3	Digitek MDL
11/19	1:00-3:15	2.3	Meet w/
	4:22-4:28	0.1	Respond to Camp Bailey's emails re service and master complaint
	6:18-6:23	0.1	Email Holly back re deadlines
	10:42-10:51	0.2	Talk to Pete Miller
	4:09-4:21	0.2	Talked to Pete A. from Morgan and Morgan about Severance
	5:40-5:47	0.2	Talk to Mitch re motion to compel
	4:46-5:05	0.4	Talk to Harry re document repository/Vendor and St. Regis accounting
	12:37-1:21	0.8	Talk to Carl re-discovery
Total:		3492.55	

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

DATE	TIME	TASK
8/1/2008	2.3	Luce trial case - intake review
8/3/2008	1.9	Order medical records - Luce trial case
8/3/2008	0.5	Phone call with Joan Luce - trial case
8/12/2008	0.5	Phone call to Joan Luce's son (trial case_
8/14/2008	0.25	Phone call with co-counsel - Luce trial case
9/9/2008	0.6	Call from Luce (trial case) friend
9/9/2008	0.5	Call to Joan Luce (trial case)
2/27/2009	0.3	Call re Joan Luce death (trial case)
3/12/2009	0.8	Call J. Fox - PR in Luce trial case
4/10/2009	2.6	Prepare and file Complaint - Luce trial case.
6/5/2009	3	Prepare PFS - calls to client - Luce trial case
6/8/2009	8.5	Prepare PFS - Luce trial case
8/4/2009	2.3	Call to Luce children re depos, pills, etc.
8/21/2009	0.3	Meet with Meghan re MDL documents
8/27/2009	0.5	Draft letter to treating doc re scheduling of depo - Luce trial case.
8/28/2009	0.5	Meet with Megan re MDL emails and how to handle
9/1/2009	3	Review all in house cases looking for class cert rep.
9/2/2009	0.5	Email, etc.
9/2/2009	0.6	Meet with Meghan regarding master MDL

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

9/2/2009	0.2	Meet with Meghan regarding MDL to-do list
9/2/2009	2.5	Research potential experts
9/3/2009	0.6	Email etc,
9/3/2009	0.75	Prepare co-lead and PSC call
9/3/2009	2.4	Co-lead, PSC, trial cases, co-lead calls
9/3/2009	3.5	Follow up to call, research, trial case research.
9/4/2009	0.3	Emails, etc.
9/7/2009	3	Meet with Meghan to review Luce (trial case) records
9/8/2009	0.4	Emails, etc.
9/8/2009	1.6	Digitek – in house – review Luce records
9/8/2009	0.3	Phone call with Meghan to Dave Wilharm re discovery
9/8/2009	0.75	Meeting with Meghan and Carmen re Luce trial case.
9/8/2009	0.3	Emails re document review
9/8/2009	0.25	Review and summarize Luce (trial case) medical records.
9/8/2009	1.3	Document production review.
9/8/2009	2.5	Work with Meghan on discovery chart
9/9/2009	0.8	Emails and calls re NMS lab depo arrangements
9/10/2009	0.8	Phone call Carl, Meghan, Fred re Lone Pine motion
9/10/2009	0.6	Distribute passwords to new Crivella West users, update spreadsheet

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

9/10/2009	0.5	Prepare tolling agreement
9/10/2009	2.25	Work on final tolling agreement for Jepson, one to use with other
9/13/2009	2.8	Digitek discovery chart
9/14/2009	0.5	Digitek in house – Work on Luce and Lange Cases
9/14/2009	3.6	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/14/2009	4.2	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/14/2009	0.25	Send email re Lange
9/14/2009	1.2	Work on discovery chart, M/C letter, get meeting set up for Thurs.
9/14/2009	0.9	Emails, etc.
9/15/2009	5	Work on upcoming depositions, experts, etc.
9/15/2009	4.5	prepare Meghan and Carmen for Luce (Fox) depositions in Atlanta
9/16/2009	3.2	Input RTP answer into spreadsheet
9/16/2009	5.8	Prepare for Doc Training
9/17/2009	3.4	Document Review Team Training
9/17/2009	13.2	Travel to Atlanta for training
9/18/2009	1	Meet and confer w/ Defendants
9/18/2009	6.3	Review emails, begin document review
9/21/2009	0.8	Luce depositions scheduling, prepare notices.
9/21/2009	1.3	Obtain addresses for Luce deponents, email defense to arrange depositions
9/22/2009	2.3	Final scheduling Luce depositions, final notices and subpoenas prepared and served

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

9/23/2009	3.6	Input employee resumes into spreadsheet
9/23/2009	0.8	Meet with Carmen and Meghan re Luce
9/23/2009	2.1	Meet with Meghan and Fred re motions
9/24/2009	8.5	Input employee resumes into spreadsheet
9/25/2009	6.5	Emails, calls from other plaintiffs attys, document review.
9/25/2009	0.4	Meet with Meghan and Fred re motion to compel
9/28/2009	4	Prepare Meghan and Carmen for NMS depo
9/29/2009	0.75	Document Review
9/29/2009	8.5	Prepare materials for Kelley, Greg Luce and Dr. Tubman depositions in Luce case.
9/30/2009	6	Draft Plaintiff's discovery to Defendants - Luce trial case.
10/1/2009	0.7	co-lead PSC call
10/1/2009	1	Meet and confer w/ Defendants
10/1/2009	1.3	Research former employees
10/2/2009	1	Class certification phone call with Meghan and Fred to PSC attys
10/2/2009	0.2	Emails regarding class cert
10/2/2009	1.5	Prepare PSC meeting minutes, distribute after atty review
10/6/2009	2	Worked with Meghan on letter to defense
10/7/2009	8	Document review
10/8/2009	8	Document Review

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

10/8/2009	0.5	Initial phone call with Carmen to expert - Luce - trial case.
10/9/2009	1	PSC phone call
10/10/2009	1.6	Documents and letter of engagement to Luce expert
10/12/2009	7.5	Document review
10/12/2009	0.2	Digitek, prepare for call
10/13/2009	1	Call with trial case attys
10/14/2009	5.5	Document review
10/14/2009	2	Preare and file depo notices
10/15/2009	3	Digitek Document Review
10/18/2009	3.5	Help Meghan prepare for PSC meeting
10/19/2009	3	Help Meghan prepare for depositions
10/23/2009	5.3	Help Meghan prepare for depositions
10/27/2009	4.8	Draft Plaintiff's Responses to discovery - Luce - trial case
10/30/2009	1.5	Prepare and serve final discovery responses, Luce - trial case.
10/30/2009	6.5	Catch up on MDL emails, documents, etc.
11/4/2009	6.5	Prepare for December depositions
11/9/2009	3.4	Work with Meghan organizing MDL files
11/10/2009	0.2	Met with Meghan and Marissa about class certs and other MDL issues
11/11/2009	0.8	Help prepare for call with co-lead counsel
11/11/2009	0.5	Call with co-lead counsel
11/11/2009	0.5	Call with defendants

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

11/11/2009	0.1	Talk to Meghan and Carmen re Luce
11/11/2009	0.2	Talk to Fred and Marissa
11/12/2009	0.5	Digitek, talk to Dave, go over documents on Crivella West
11/12/2009	3.5	Document review
11/13/2009	0.5	Help Meghan prepare for class action call
11/13/2009	1.2	Class Action Call
11/13/2009	4	Upload exhibits and transcripts to Crivella West
11/14/2009	2.5	Organize documents for corporate depositions
11/17/2009	2	Work on trial summary letter with Meghan and Fred
11/17/2009	0.2	Attempted Call w/ Dr. Butterly
11/18/2009	1.2	Emails, phone calls, etc.
11/18/2009	1.5	Call with Dr. Nelson
11/18/2009	1	Class action phone call
11/18/2009	0.6	Call with Dr. Rubin
11/18/2009	2.1	Locate and send documents to Dr. Rubin
11/18/2009	0.8	Call with Dr. Butterly
11/18/2009	3.4	Help Meghan prepare for status conference
11/20/2009	2	Prepare and file depo notices
11/23/2009	0.3	Review status conference materials with Meghan
11/23/2009	0.1	Talk to Carmen and Meghan re Luce

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

11/23/2009	0.5	Talk to Meghan and Fred re December depos and status conference
11/23/2009	8	Prepared and filed corporate depo notices
11/24/2009	3.5	Prepare and file depo notices
11/24/2009	1.5	Prepare for call
11/24/2009	0.9	Call w/ Trial Counsel & Deposition Group
11/24/2009	0.75	Phone call Dr. Denker - Luce case
11/30/2009	8.3	Locate depo transcript excerpts for motion
12/1/2009	1.5	Work with Meghan on PSC expenses reimbursement
12/1/2009	4.6	Pull depo excerpts for motion
12/2/2009	0.2	Prepare for call
12/2/2009	0.7	PSC call re: corporate depos
12/2/2009	1.2	Talk to Fred and Meghan re MDL expenses, to-do list.
12/2/2009	2.6	Prepare and file 30 (b)(6) depo notices
12/3/2009	3.4	Prepare for corporate depos
12/4/2009	3	Help prepare exhibits for depos
12/13/2009	1.2	Prepare for call with Dr. Denker - Luce case
12/14/2009	1	Phone call with Carmen to Dr. Denker, potential Luce expert
12/14/2009	0.8	Prepare memo regarding Denker phone call - Luce - trial case.
12/18/2009	0.5	Meet and confer w/ Defendants
12/30/2009	0.9	Phone call with expert committee
12/30/2009	0.6	Meet and confer w/ Defendants

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

12/30/2009	2.9	Pulled inspectors' names from 483's and researched if still with Actavis, etc.
1/5/2010	0.8	Phone call with Kowalski, potential expert
1/6/2010	1.3	Prepare CD's of medical records, cover letters to treating docs, other docs prior to depos - Luce - trial case.
1/7/2010	1.3	PSC phone call
2/2/2010	1	PSC Committee phone call
2/2/2010	0.8	Meet and confer w/ Defendants
2/11/2010	1.2	Called into status conference (Judge Stanley) with Carmen
2/17/2010	1	Phone call with Kowalski, potential expert
2/17/2010	2.3	Locate and prepare document to send to Kowalski, potential expert
2/19/2010	2	Prepare for call with Mark Kenney, potential QC expert
2/19/2010	0.6	Phone call with Mark Kenney, potential QC expert
2/20/2010	4.8	Locate and prepare documents to send to Mark Kenney, Letter of Engagement
3/8/2010	3.4	Prepare for PSC Committee Meeting
3/9/2010	6.2	Prepare for PSC Committee Meeting
3/10/2010	9	PSC Committee Meeting at Motley Rice
3/23/2010	3.5	Prepare for expert phone call
3/23/2010	0.8	Phone call with Spyglass experts
4/6/2010	2.8	Research potential experts, prepare for call
4/6/2010	1.2	Expert Committee phone conference

Sandy Summers, Paralegal, Motley Rice LLC
Digitek MDL Time

4/8/2010	0.75	Trial Case attys phone call
Total:	359.95	

Mitchell Thornton, Motley Rice

Digitek MDL

TIME KEEPER'S NAME	ATTORNEY LEVEL	DATE OF WORK PERFORMED	AMOUNT OF TIME BILLED	DESCRIPTION OF WORK PERFORMED
Mitchell Thornton	Associate	08/18/09-08/19/09	4	Review FOIA information to discern potential discoverable lots
Mitchell Thornton	Associate	9/10/2009	1.1	Research/draft portion of response to Defendants' objections
Mitchell Thornton	Associate	11/3/2009	3.2	Research for Class Action
Mitchell Thornton	Associate	11/4/2009	2.8	Research for Class Action
Mitchell Thornton	Associate	12/9/2009	3.3	Research for response
Mitchell Thornton	Associate	12/30/2009	0.4	Research for memo
Mitchell Thornton	Associate	1/6/2010	3.7	Research and draft memo
Mitchell Thornton	Associate	1/8/2010	2.8	Research and draft memo
Mitchell Thornton	Associate	1/11/2010	3.9	Drafting memo
Mitchell Thornton	Associate	1/12/2010	0.5	Research/Correspondence
Mitchell Thornton	Associate	1/14/2010	2.5	Research for Motion to Compel
Mitchell Thornton	Associate	1/15/2010	4	Drafting Motion to Compel
Mitchell Thornton	Associate	1/18/2010	1.5	Motion to Compel
Mitchell Thornton	Associate	1/19/2010	3	Document Discovery Training & Review
Mitchell Thornton	Associate	1/21/2010	2.7	Memo & Document Review
Mitchell Thornton	Associate	1/22/2010	2	Document Review
Mitchell Thornton	Associate	1/29/2010	0.4	Research
Mitchell Thornton	Associate	2/1/2010	1.5	Research

Mitchell Thornton, Motley Rice

Digitek MDL

Mitchell Thornton	Associate	2/2/2010	0.3	Research
Mitchell Thornton	Associate	2/3/2010	0.5	Research
Mitchell Thornton	Associate	2/4/2010	2.1	Research & Draft Motion to Compel
Mitchell Thornton	Associate	2/5/2010	3.8	Motion to Compel
Mitchell Thornton	Associate	3/15/2010	0.3	Reply Brief
Mitchell Thornton	Associate	3/17/2010	3.1	Reply Brief
Mitchell Thornton	Associate	3/18/2010	3	Reply Brief
Mitchell Thornton	Associate	3/19/2010	2.9	Reply Brief
Mitchell Thornton	Associate	3/22/2010	2.8	Reply Brief
Mitchell Thornton	Associate	3/30/2010	0.4	Research
Mitchell Thornton	Associate	4/7/2010	0.2	Correspondence
Mitchell Thornton	Associate	4/15/2010	0.2	Correspondence
Mitchell Thornton	Associate	6/10/2010	3.5	Document Review
Mitchell Thornton	Associate	6/11/2010	4.7	Document Review
Mitchell Thornton	Associate	6/22/2010	4.5	Plaintiff's Fact Sheets
Mitchell Thornton	Associate	6/23/2010	4	Plaintiff's Fact Sheets
Mitchell Thornton	Associate	6/24/2010	5	Plaintiff's Fact Sheets
Mitchell Thornton	Associate	6/25/2010	4.8	Plaintiff's Fact Sheets
Mitchell Thornton	Associate	6/28/2010	2.4	Plaintiff's Fact Sheets
Mitchell Thornton	Associate	7/30/2010	0.6	Research & Correspondence
Mitchell Thornton	Associate	9/15/2010	1.5	Response to Defendants' Motion
Mitchell Thornton	Associate	9/16/2010	2.8	Response to Defendants' Motion
Mitchell Thornton	Associate	9/16/2010	4	Settlement Letter Distribution
Mitchell Thornton	Associate	9/21/2010	0.2	Correspondence
Mitchell Thornton	Associate	9/28/2010	1.5	Response to Defendants' Motion
Mitchell Thornton	Associate	10/22/2010	1	Motion to Extend Time Scheduling Order
Total:			103.4	

Carmen Scott, Motley Rice LLC
Digitek MDL Time

Date	Client Name	Description	Column1
11/07/08	Digitek-MDL	Meet w/ Fred Thompson Re-Digitek Project	0.30
11/11/08	Digitek-MDL	Digitek PSC Conference Call	1.00
11/17/08	Digitek-MDL	preparing, reading & printing documents for Status Conference. Read & commented on Fred's Budget Proposal	2.00
11/18/08	Digitek-MDL	Travel to Charleston WV for Status Conference	4.50
11/18/08	Digitek-MDL	Meeting at Harry Bell's Office w/ some members of PSC	2.00
11/18/08	Digitek-MDL	PSC Meeting	2.50
11/18/08	Digitek-MDL	Meeting with Defendants	2.00
11/19/08	Digitek-MDL	At Court House For Status Conference	3.00
11/19/08	Digitek-MDL	Travel back to Charleston, SC from Charleston, WV	5.00
06/18/09	Digitek-MDL	Science and expert committee call	1.00
10/1/2009	Digitek	discuss depositions with co-counsel	1
10.19.09	Digitek – MDL	Travel to NY and participate in MDL meeting.	12
10.5.09	Digitek	work on various estate issues; review medical records and make filing decisions; work on scheduling treater depos in Luce trial case	3
10.6.09	Digitek	Tel call with potential expert nephrologist	0.5
11.11.09	digitek	review Weitz Lux and corr w/ ellen relkin re same; discuss with f. Thompson	1.5
11.12.09	Digitek	review Weitz Lux and corr w/ ellen relkin re same; discuss with f. Thompson	4
11.17.09	Digitek	Phone call to expert butterfly; review weitz lux cases for merit; work on fee agreement issues for co-counsel; make filing decisions	4
11.18.09	Digitek	prepare for calls with experts; have calls	4
11.19.09	Digitek	travel to boston for meeting with dr. furman	14
11.2.09	Digitek	discuss depositions with co-counsel	1

Carmen Scott, Motley Rice LLC
Digitek MDL Time

11.3.09	Digitek	discuss expert issues with cc; review files for merit; make retention decisions and discuss same with referring counsel	2
11.9.09	Digitek	review Weitz Lux and corr w/ ellen relkin re same; discuss with f. Thompson	2
4.12.09	Digitek	Respond to potential client's questions regarding estate issues. Research filing issues in WV.	1.5
4.14.09	Digitek	Document review meeting with potential vendors; review intake	1.25
4.15.09	Digitek	Review order related to Defendant's Fact sheets; review medical records for potential cases; corr w/ clients re: probate issues; review article re Actavis	2.5
4.21.09	Digitek – General	TCW expert Dr. McNair; discuss issues with PSC and F. Thompson; read Motions and Memos re: Dismissals of counts of complaints; work on issues concerning tolling agreements	2
4.24.09	Digitek	Work on consumer class action; find class rep and discuss duties with him	3.5
4.8.09	Digitek	Work on MDL draft discovery to defendants; work on individual cases to make filing determinations; discuss trust versus PR issues with J. Gilbert.	2
4.9.09	Digitek	Review re-draft of proposed discovery; review meds in potential case from Pintas; review and re-draft new complaint; work on materials to send to expert	2.5
9.16.09	Digitek	Travel to Atlanta for depo of Jackie Fox in Joan Luce case	9
9.20.09	Digitek	work on issues involving treater and fact witness depositions in Luce case	1
9.8.09	Digitek	review and respond to various emails regarding luce depositions	1
Total			98.55

EXHIBIT 2

Fred Thompson, Motley Rice

Digitek Class Timekeeping

Date	Description	Time
1/14/2009	Set up Class action subcommittee; Conference with M. Carter re: members and setting up calls.	1.2
5/15/2009	Prepare for call. Class Action Call	1.1
6/19/2009	Conference with atty. Carter re Class rep depositions	0.7
7/2/2009	Prepare for call; Class Action Call;	1.2
7/10/2009	Prepare for call; Class Action Call;	1.1
7/23/2009	Class Action Call	0.7
7/27/2009	Prepare for call. Call w/ Judge Stanley re Class Action.	0.7
7/29/2009	Class action discovery.	1.2
9/1/2009	Conference with M. Carter re: class action.	0.4
9/15/2009	Edit Request for Class Certification; Finalize and file.	3.2
9/28/2009	Review Letter to Court re Class Certification.	0.3
9/29/2009	Review class certification scheduling order. Forward to staff for calendaring.	0.6
10/2/2009	Prepare for call; Class Action Call	1.1
11/13/2009	Prepare for call; Class Action Call.	1.3
11/18/2009	Prepare for call; Class Action Call;	1
11/24/2009	Review PTO 47 extending deadlines.	0.3
1/21/2010	Motion for Class Certifacation; Finalize and file.	3.5
6/1/2010	Class action Call	1
6/8/2010	Get ready for class call, class call,	1.6
6/9/2010	Class Action Committee Conference Call	1
7/16/2010	Meeting with M. Carter re: class claims.	0.8
9/14/2010	Class Action Call.	1.1
Total:		25.1

Meghan Carter
Digitek Class Time

Date	Time	Hours	Description
01/14/09		0.30	Email Class Action Subcommittee
01/20/09		0.30	Talk w/ Fred re Class committee Conf. Call
01/20/09		0.50	Class Committee Call
02/05/09		5.50	research class action representatives
4/24/2009	10:30-10:40	0.2	Talk to Ashley Ownby re potential class suit representing state of Tenn.
5/11/2009	2:40-2:50	0.2	Look up Law.com article on dismissal of consumer class action in Vioxx
5/15/2009	2:30-2:45	0.3	Class Action Call
6/19/2009	2:38-2:45	0.2	Talk to Fred re Class rep deps and Ervin complaint
6/19/2009	2:45-3:00	0.3	Talk to Sandy re Ervin
6/22/2009	10:17-12:15	2	Work on Class Action Chart
6/22/2009	2:50-5:00	2.2	Class Action Chart, , talk to Doug Peters re Love Class Action
6/22/2009	6:15-8:30	2.3	Class Action Chart, Class-Counsel chart with email addresses
6/23/2009	11:15-1:07	1.9	send out email to class counsel, email pat Avery re class chart, update class chart,
6/25/2009	8:45-9:40	1	class action chart update;
6/29/2009	4:50-6:10	1.4	work on class action chart, class action email,
6/30/2009	11:30-12:05	0.6	Email about class call etc
6/30/2009	1:50-3:30	1.7	Send out class action email,
7/1/2009	12:30-2:08	1.7	Class Action Call
7/2/2009	11:15-11:35	0.4	Call w/ Class Counsel w/ first deposition. Counsel decided to withdraw class allegations
7/9/2009	2:00-2:05	0.1	MDL – email re Class Call
7/10/2009	11:00-12:30	1.5	Class Action Committee Call
7/10/2009	2:15-3:00	0.8	Prepare for call, call w/ Robert Becnel's office (Dianne Zink)
7/10/2009	4:30-4:51	0.4	send final draft to class committee, send email to Diane Zink re class dep.

Meghan Carter
Digitek Class Time

7/23/2009	11:23 -11:40	0.3	Talk to Debs re class action
7/23/2009	3:14-3:30	0.3	Prepare for Call
7/23/2009	3:30-4:10	0.7	Class Action Call
7/23/2009	4:10-4:30	0.4	Working on letter to Court re class
7/23/2009	4:35-5:30	1	Working on Letter to Court re class issue (researching cases),
7/23/2009	6:20-7:40	1.4	called Debs re class action, work on class discovery.
7/23/2009	7:42-7:55	0.3	Distribute transcript re Milligan Class action, email out letters to class committee etc
7/24/2009	9:00-10:00	1	Research Class Action issues for letter
7/24/2009	1:30-5:30	4	Research Class Action issues for letter
7/27/2009	9:20-9:50	0.5	Prepare for call
7/27/2009	9:50-10:42	0.9	Call w/ Judge Stanley re Class Action
7/27/2009	10:42-12:00	1.3	Discuss Call - class action discovery
7/27/2009	1:02-5:00	4	Work on class action discovery
7/28/2009	8:15-8:30	0.3	Email re Class Action Deposition Today
7/29/2009	12:00 – 12:26	0.5	work on class action discovery
7/29/2009	1:40-2:20	0.7	Look over motions re medical records, work on class action discovery
7/29/2009	3:00-3:45	0.8	work on class action discovery
7/31/2009	11:15-11:25	0.2	Talk to John M. re class action issues
8/19/2009	9:22-9:32	0.2	Digitek – looking up (and calculating) class certification deadlines and emailing to Pat Avery
8/19/2009	5:48-5:55	0.2	Email Jim Pettit and Pat Avery re Class Action issues discussed on call today with Defendants
8/21/2009	10:44-10:51	0.2	Email and read to Fred & marissa re class deadlines
9/1/2009	9:40-9:58	0.3	Talk to Mark Bonner, Fred re class action, email Andy
9/1/2009	10:27-12:58	2.6	Get message from Bonner, call Kristen back, work on class issues.

Meghan Carter
Digitek Class Time

9/1/2009	2:00-6:10	4.2	Working on class cert email, class cert letter, updating listserv, looking for class cert expert
9/1/2009	6:22-6:55	0.6	Working on class cert email, class cert letter, updating listserv, looking for class cert expert
9/1/2009	7:10-8:24	1.3	Working on class cert email, class cert letter, updating listserv, looking for class cert expert
9/8/2009	2:30-2:40	0.25	Talk to Carl & Call Mr. Lange re deposition date
9/9/2009	9:38-9:45	0.2	Email lead re Class Action
9/28/2009	4:45-5:00	0.3	Write Letter to Court re Class Certification
9/28/2009	5:00-5:20	0.4	Talk to Fred re Letter
10/2/2009	11:00-12:00	1	Class Action Call
10/2/2009	12:00-12:20	0.4	Talk to Carl re Lange & MDL
10/2/2009	3:32-3:45	0.3	Digitek MDL- emailing re class
10/19/2009	4:00-6:00	2	Meeting with Jim re Class Action, Work w/ David on Class cert
10/20/2009	6:30-7:00	0.5	discuss class cert reply
10/20/2009	9:00-11:45	2.8	Work on reply brief for class cert and get it filed. Prepare for depositions
11/3/2009	12:40-4:30	3.9	Work on class action issues, talk to Mitch, email re class actions, etc
11/3/2009	4:53-7:25	2.6	Update class action chart/check on status of complaints on pacer, email class committee,
11/4/2009	11:00-11:20	0.4	talk to Mitch re class action cases
11/4/2009	2:00-4:40	2.7	Digitek, work on class action information, read through class action cases, Class action call,
11/4/2009	5:05-5:50	0.8	talk to Jim after class call
11/10/2009	5:45-5:58	0.3	Call w/ Natalie & Pat re Class Action
11/12/2009	10:46-12:25	1.7	Talked to Natalie, coding docs, talked to Carl (12:00-12:10), emailed class committee.

Meghan Carter
Digitek Class Time

11/12/2009	1:10-1:21	0.2	looked over class complaint
11/12/2009	4:25-4:37	0.2	sent out email re class action call
11/12/2009	5:00-5:15	0.3	Load class action files on crivella West
11/12/2009	6:00-7:16	1.3	Talk to Fred re Digitek (6:00-6:17), upload class action case-law
11/13/2009	9:15-9:30	0.25	Prepare for call
11/13/2009	9:30-10:42	1.2	Class Action Call
11/17/2009	2:13-2:57	0.8	Proofread letter to court, talk to David, look up rule & email class committee, go over class emails.
11/18/2009	12:25-1:14	0.9	Class Action Call (call was actually 12:00
11/23/2009	10:41-10:44	0.1	Email back Mike Bonner re Vaughn class action.
12/2/2009	9:21-10:37	1.3	Review depositions, email out class rep transcripts,
9/14/2009	5:40-5:42	0.25	Send email re Lange
1/11/2010	1:00-2:00	1	fact summary for class action
1/19/2010	11:00-1:10	2.2	Prepare for depositions / class action stuff
1/19/2010	9:00-11:00	2	class action stuff
2/19/2010	3:15-6:14	3	Get motion final fixed, get it filed, update listserv, go through docs for class action, print/save defendants class cert response brief, print bitlers dep for Misbah info., email
2/25/2010	12:18-12:55	0.7	Digitek – Class Action , talk to Kristen re extension, send email to Pat etc
2/25/2010	1:00-1:11	0.2	Return Pat's email, sandy's email etc
2/25/2010	2:33-2:46	0.3	Class action email and go through master exhibits
2/25/2010	4:19-4:40	0.4	Class Action stuff (MDL)
2/28/2010	12:15-1:50	1.5	Digitek – Class action – send emails and find docs for group
2/28/2010	12:15-1:50	1.5	Digitek – Class action – send emails and find docs for group
3/1/2010	8:56-8:58	0.1	Email Pat Avery
3/4/2010	5:55-7:54	2	Digitek, class docs, class section
3/5/2010	11:17-12:07	0.9	Digitek – talk to E. Robinson re class stuff

Meghan Carter
Digitek Class Time

3/8/2010	2:18-2:53	0.6	Class Action stuff, - talk to Elizabeth re declaration, talk to Sandy re subpoena, check request and service.
3/8/2010	10:00-12:08	2.2	Get Class Action filed etc
6/7/2010	2:10-2:23	0.3	Class call prep
6/7/2010	2:25-3:00	0.6	Get ready for class call, class call, expert review
7/15/2010	5:59-6:19	0.4	Leave holly a message, email, talk to Fred about class claims
9/13/2010	11:07-11:12	0.1	Respond to Carl's email re class actions
9/13/2010	11:50-12:15	0.5	Talk to Fred and then email re Class action call
9/14/2010	2:00-2:45	0.8	Class Action Call w/ Fred (and work on letter)
10/4/2010	11:05-11:15	0.2	Email re class call and talk to Carl
2/25/2010	2:21-2:28	0.2	Email Sandy re Golkow and Pat re class actions
Total:		103.05	

EXHIBIT 3

Meghan Carter, Motley Rice LLC

Trial Case Time (Fox/Luce v. Actavis)

Date	Case	Time	Hours
9/7/2009	Digitek Luce		3
9/8/2009	Digitek Luce	9:54-10:10	0.5
9/8/2009	Digitek Luce	10:12-10:22	0.25
9/8/2009	Digitek Luce	10:27-11:15	1
9/8/2009	Digitek Luce	11:55-12:15	0.5
9/8/2009	Digitek Luce	12:15-12:19	0.25
9/8/2009	Digitek Luce	12:26-12:35	0.25
9/8/2009	Digitek Luce	12:42-12:50	0.25
9/8/2009	Digitek Luce	9:45-11:20	1.75
9/9/2009	Digitek Luce	11:58-12:05	0.25
9/16/2009	Digitek Luce	5:45-9:20	3.75
9/16/2009	Digitek Luce	9:20-11:00	1.75
9/16/2009	Digitek Luce	11:00-2:30	3.5
9/16/2009	Digitek Luce	2:30-3:55	1.5
9/23/2009	Digitek Luce	9:58-10:13	0.25
9/28/2009	Digitek Luce	10:45-11:15	0.5
9/28/2009	Digitek Luce	12:40-12:50	0.25
9/28/2009	Digitek Luce	2:30-3:30	1
9/29/2009	Digitek Luce	2:50-8:35	5.75
9/30/2009	Digitek Luce	8:30-3:45	7.25
9/30/2009	Digitek Luce	4:00-11:15	7.25
11/23/2009	Digitek Luce	11:36-11:38	0.1
11/24/2009	Digitek Luce	3:04-3:40	0.75
12/7/2010	Digitek Luce	3:50-3:55	0.25
12/7/2010	Digitek Luce	4:01-4:03	0.25
Total:			42.1

Description
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Talk to Sandy & Carmen re in house Digitek – Luce case
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Digitek – in house – review Luce records
Look up law in Luce & email out
Travel to Atlanta
Meet w/ Ms. Fox
Fox Deposition
Travel
Luce, go over w/ Carman & Sandy
Digitek – Luce
Digitek Luce
Talk to Dr. Tubman and Susan Kelley
Travel to Bay City Michigan
Susan Kelley, Greg Luce and Dr. Tubman depositions
Travel back to SC
Talk to carman re luce
Talk to Nephrologist in Luce case
Talk to Sandy re Cross-notice/ subpoena
Talk to Sandy re Cross-notice/subpoena

EXHIBIT 4

Motley Rice MDL Held Expenses

Task Code Description	Bill Date	AP Distribution Description	AP Check N	Bill Amount
Online Research				
	18-Sep-08	West Payment Center-August 2008 searches	10163470	57.45
	31-Oct-08	Pacer-3rd Quarter 2008 Searches	10165155	3.52
	26-Nov-08	West Payment Center-October 2008 Searches	10166190	33.28
	05-Jan-09	Bloomberg Finance LP-United States v. Actavis Totowa Pleading	41499	126.64
	06-Feb-09	Pacer Service Center-4th Quarter Research	42412	287.76
	27-Apr-09	Pacer Service Center-1st Quarter 2009 research charges	44420	78.56
	18-May-09	LexisNexis Courtlink, Inc.-April 2009 Charges (Document Fee)	44935	6.42
	18-May-09	LexisNexis Courtlink, Inc.-April 2009 Charges (Report - Cases)	44935	10.65
		LexisNexis Courtlink, Inc.-April 2009 Charges (Report - Documents By		
	18-May-09	Case)	44935	10.65
	27-Jul-09	Pacer Service Center-2nd quarter 2009 research	46659	97.92
	14-Sep-09	West Payment Center-July 2009 Research	10175628	221.72
	14-Sep-09	LexisNexis-Juen 2009 Research	10175633	207.39
	14-Sep-09	LexisNexis-July 2009 Research	10175634	140.77
	22-Oct-09	LexisNexis-September research	10176841	35.03
	29-Oct-09	Pacer Service Center-3rd quarter 2009 research	48902	145.20
	24-Nov-09	West Payment Center-September Research	10177909	155.60
	11-Dec-09	LexisNexis CourtLink-November research	50022	94.32
	30-Dec-09	LexisNexis-November 2009 research	10178972	188.45
	14-Jan-10	Pacer Service Center-4th quarter 2009 research	50829	33.92
	28-Jan-10	LexisNexis December 2009 research	10180045	145.54
	19-Mar-10	LexisNexis-January 2010 Research	10182038	127.53
	29-Mar-10	AT&T Teleconference Services-February 2010	52914	4.73
	29-Mar-10	AT&T Teleconference Services-February 2010	52914	106.36
	09-Apr-10	LexisNexis-February 2010 Searches	10182887	108.95
	20-Apr-10	PACER Service Center-1st Quarter Research	53585	99.20
	23-Apr-10	West Payment Center-Janaury 2010 Research	10183419	21.76
	30-Apr-10	LexisNexis-March 2010 online research	10183689	5.55
	30-Apr-10	West Payment Center-February 2010 Online Research	10183707	35.69
	20-May-10	LexisNexis-April 2010 research	10184333	62.28
	28-Jun-10	LexisNexis-May 2010 Research	10185626	206.85
	15-Jul-10	PACER Service Center-2nd quarter 2010 research	55801	19.36

Motley Rice MDL Held Expenses

	30-Aug-10 West Payment Center-July 2010 Research	10187888	160.82
	30-Aug-10 LexisNexis-July 2010 Research	10187889	4.43
	24-Sep-10 Wes Payment Center-August 2010 Research	10188798	3.88
	29-Oct-10 LexisNexis-September 2010 Research	10190271	143.62
	29-Oct-10 Wes Payment Center-September 2010 Research	10190303	6.48
	02-Dec-10 PACER Service Center-3rd quarter 2010 research	59643	12.72
Other Expenses			
	10-Feb-09 Digitek PSC Fund-Common benefit fund assessment	42498	7,415.72
	10-Feb-09 Digitek PSC Fund-Common benefit fund assessment	42498	17,584.28
	26-Oct-10 CDW Direct, LLC-My Passport USB portable 500GB hard drive	58666	193.05
Out of Town Travel			
	American Express-Carmen Scott-Travel to Boston, MA to meet with Digitek expert June 18, 2008	37658	1,139.00
	Fred Thompson-Travel to Charleston, WV for PSC meeting October 9-10, 2008	39340	1,619.96
	Fred Thompson-Travel to Charleston, WV for Digitek hearing October 23-24, 2008	39803	472.84
	13-Nov-08 Fred Thompson-Travel to Charleston, WV for meeting with judge re: PSC	40156	1,777.48
	21-Nov-08 Carmen Scott-Travel to Charleston, WV for Digitek meetings October 9, 2008	40357	35.55
	American Express-Carmen Scott travel to Charleston, WV for Digitek meetings October 9-11, 2008	40358	1,010.81
	21-Nov-08 American Express-Carmen Scott-Flight change fee	40358	150.00
	Fred Thompson-Travel to Charleston, WV for PSC meeting November 19-20, 2008	40551	1,350.69
	Fred Thompson-Travel to Charleston, WV for mandatory conference with judge November 25-26, 2008	40797	989.18
	Meghan Johnson-Travel to Charleston, WV for PSC meeting November 18-19, 2008	40802	1,342.06
	Meghan Johnson-Travel to Charleston, WV for Digitek meeting with defense leads and Digitek status conference January 27-28, 2009	42244	750.78
	Meghan Johnson-Travel to Charleston, WV for Digitek meeting January 21-22, 2009	42244	1,174.18

Motley Rice MDL Held Expenses

05-Feb-09	Fred Thompson-Travel to Charleston, WV for status conference (got stuck in Charlotte, NC), January 26, 2009	42319	810.41
05-Feb-09	Fred Thompson-Travel to Washington, DC to meet and confer with defendants January 21-22, 2009	42319	1,535.51
20-Feb-09	Fred Thompson-Travel to New Orleans, LA for presentations February 5-10, 2009	42702	784.98
13-Mar-09	Meghan Johnson-Travel to Charleston, WV for meeting with defendants and discovery conference February 24-25, 2009	43284	7.39
13-Mar-09	Fred Thompson-Travel to Charleston, SC for status conference March 4-5, 2009	43298	1,253.14
13-Mar-09	Fred Thompson-Travel to Charleston, WV for Digitek status conference February 24-25, 2009	43298	630.18
13-Mar-09	Fred Thompson-Travel to Houston, TX for PSC meeting March 9-10, 2009	43298	1,341.95
18-Mar-09	Meghan Johnson-Travel to Charleston, WV for Digitek Status Conference March 4-5, 2009	43405	1,365.13
18-Mar-09	Meghan Johnson-Travel to Houston, TX for Digitek PSC meeting March 9-10, 2009	43405	1,316.19
18-Mar-09	Meghan Johnson-Travel to Charleston, WV for hearing/meeting with defendants February 24-25, 2009	43405	306.00
06-May-09	Meghan Johnson Carter-Travel to Charleston, WV for Digitek Status Conference April 28-29, 2009	44689	1,134.02
06-May-09	Fred Thompson-Travel to Charleston, WV for status conference with Judge Goodwin April 28-29, 2009	44690	1,237.91
28-May-09	U.S. Air-Airfare for Rose Sullivan (chs-clt-pit-clt-chs)	10172357	327.90
29-May-09	Rose Sullivan-Travel to Weirton, WV for training with Crivella West on Digitek document repository software May 19, 2009	45218	46.91
08-Jun-09	Meghan Johnson Carter-Travel to New York, NY for depositions May 27-29, 2009	45525	1,519.36
08-Jun-09	Meghan Johnson Carter-Travel to Pittsburgh, PA for depositions and training May 18-20, 2009	45525	1,714.12
11-Jun-09	Fred Thompson-Travel to New York, NY for two depositions May 19-21, 2009	45608	2,323.97
11-Jun-09	Fred Thompson-Travel to New York, NY for depositions May 27-29, 2009	45608	1,887.63

Motley Rice MDL Held Expenses

16-Jun-09	Meghan Johnson Carter-Travel to Houston, TX for Digitek PSC meeting June 10-11, 2009	45731	1,418.48
19-Jun-09	Meghan Johnson Carter-Travel to Charleston, SC for status conference June 17, 2009	45822	878.05
29-Jun-09	Fred Thompson-Travel to Charleston, WV for status conference June 16-17, 2009	46019	1,139.68
08-Jul-09	Fred Thompson-Travel to Houston, TX for PSC meeting June 10-11, 2009	46242	1,430.48
20-Jul-09	Fred Thompson-Travel to Philadelphia, PA for hearing July 14-15, 2009	46463	2,045.03
28-Jul-09	Meghan Johnson Carter-Travel to Philadelphia, PA for trial selection meeting July 14-15, 2009	46694	1,230.01
05-Aug-09	Meghan Johnson Carter-Travel to Charleston, WV for trial selection hearing July 22, 2009	46868	811.70
19-Aug-09	Meghan Johnson Carter - Travel to <Charleston, WV> [8/11-12/2009] for status conference	47141	811.32
19-Aug-09	Meghan Johnson Carter-Supplemental expense for trip to Charleston,WV for trial section hearing July 22, 2009	47141	13.77
22-Sep-09	Sandy Summers-Travel to Atlanta, GA for document review training September 17, 2009	47990	30.10
06-Oct-09	Meghan Johnson Carter- Travel to Atlanta, GA for Document Review Training on September 17, 2009	48284	462.24
14-Oct-09	Meghan Johnson Carter-Travel to Philadelphia, PA for MDL depositions on September 29, 2009	48481	419.33
29-Oct-09	Fred Thompson-Travel to New York, NY to attend depositions of Mark Toole, Rich Mayo, Eamonn Murphy and Narendra Kumer Patel on October 19-22, 2009	48891	2,547.24
29-Oct-09	American Express-September airfare (delta) for summers/sandy (chs-atl-chs)	10177084	11.00
29-Oct-09	American Express-September airfare (delta) for summers/sandy (chs-atl-chs)	10177084	269.53
05-Nov-09	Meghan Johnson Carter-Travel to New York, NY for MDL depositions on October 18-25, 2009	10177285	3,444.06
05-Nov-09	Meghan Johnson Carter-Travel to New York, NY for MDL depositions on October 26-27, 2009	10177286	145.56

Motley Rice MDL Held Expenses

05-Nov-09	Meghan Johnson Carter-Supplemental expense-Travel to New York, NY for MDL depositions on October 18-24, 2009	49031	191.57
05-Nov-09	Meghan Johnson Carter-Supplemental expense-Travel to New York, NY for MDL depositions on October 25-27, 2009	49032	116.77
04-Dec-09	Fred Thompson-Travel to Charleston, WV for Digitek hearing on November 18-20, 2009	49768	1,935.61
04-Dec-09	Meghan Johnson Carter-Travel to Boston, MA to meet with MDL expert on November 19-20, 2009	49802	1,536.45
10-Dec-09	Carmen Scott-Travel to New York, NY for plaintiffs steering committee meeting on October 19, 2009	49947	1,088.51
29-Dec-09	Meghan Johnson Carter-Travel to New York, NY for depositions on December 13-16, 2009	50331	2,880.74
04-Jan-10	Carmen Scott-Travel to Boston, MA to meet with Digitek MDL expert, Marc Furman, MD on November 19, 2009	50485	670.68
15-Jan-10	Fred Thompson-Travel to New York, NY to attend depositions of Rick Dowling, Jisheng Zhu and Swapam Roychowdhury on December 13-18, 2009	50883	3,084.71
02-Feb-10	Meghan Johnson Carter-Travel to Wayne, NJ for depositions on January 17-18, 2010	51320	1,517.23
05-Feb-10	Meghan Johnson Carter-Travel to Morgantown, WV for depositions on January 20-22, 2010	51439	1,104.60
05-Feb-10	Meghan Johnson Carter-Travel to Fairfield, NJ for deposition on January 22, 2010	10180400	498.56
12-Feb-10	Fred Thompson-Travel to New York, NY for Digitek Corporate Depositions January 26-27, 2010	51656	1,599.15
22-Feb-10	Meghan Johnson Carter-Travel to New York, NY for depositions January 26-28, 2010	51885	1,948.34
23-Feb-10	Fred Thompson-Travel to New York, NY for Olufsson deposition and status conference February 9-12, 2010	51898	3,654.84
23-Feb-10	Meghan Carter-Travel to New York, NY for depositions of Hakim, Young, Olafsson February 7-12, 2010	51899	3,819.97
23-Feb-10	Carmen Scott-Travel to New York, NY for Digitek PSC meeting October 19, 2009-Supplemental	10181081	33.97
15-Mar-10	Fred Thompson-Travel to Cleveland, OH for meeting with liason counsel February 23, 2010	52524	1,545.24

Motley Rice MDL Held Expenses

07-Apr-10	Meghan Carter-Travel to New York, NY for depositions February 11, 2010-Supplemental	10182702	18.60
07-Apr-10	Meghan Carter-Travel to New York, NY for depositions of Doug Booth and Misbah Sherwani March 16-19, 2010	53155	2,539.88
07-Apr-10	Fred Thompson-Travel to New York, NY for meeting March 16-18, 2010	53156	2,071.78
07-Apr-10	Fred Thompson-Travel to Charleston, WV for meeting March 15-16, 2010	53156	1,004.39
07-Apr-10	Meghan Carter-Travel to Louisville, KY October 5, 2009-Supplemental	10182747	7.95
07-Apr-10	Meghan Carter-Travel to Boston, MA November 19, 2009-Supplemental	10182748	15.00
07-Apr-10	Meghan Carter-Travel to New York, NY January 26-28, 2010-Supplemental	10182750	47.68
07-Apr-10	Meghan Carter-Travel to New York, NY for deposition of Jasmine Shah March 25-26, 2010	53182	1,590.16
12-Apr-10	Fred Thompson-Travel to New York, NY for depositions of Sarita Tharpar and Ashok Nigalaye March 29-March 31, 2010	53328	1,555.32
13-Apr-10	Meghan Carter-Travel to New York, NY for depositions of Sarita Tharpar and Ashok Nigalaye on March 29-31, 2010	53384	1,738.32
04-May-10	Meghan Carter-Travel to Charleston, WV to attend hearing April 12-13, 2010	53908	885.63
14-May-10	Fred Thompson-Travel to New York, NY for amended deposition of Divya Patel April 29-30, 2010	54209	1,775.01
14-May-10	Meghan Carter-Travel to Indian Beach, FL to meet with expert April 26-27, 2010	54214	288.96
21-May-10	Fred Thompson-Travel to Charleston, WV for status conference April 12-13, 2010	54347	915.19
21-May-10	Fred Thompson-Travel to Cleveland, OH for meeting with liason counsel May 5, 2010	54348	1,099.18
21-May-10	Fred Thompson-Travel to New York, NY for second deposition of Rick Dowling May 5-6, 2010	54348	1,826.83
24-May-10	Meghan Carter-Travel to New York, NY for deposition of Divya Patel April 29-30, 2010	54370	1,102.82

Motley Rice MDL Held Expenses

24-May-10	Meghan Carter-Travel to New York, NY for second deposition of Rick Dowling May 5-6, 2010	54371	1,903.45
24-May-10	Meghan Carter-Travel to New York, NY for depositions of Eric Cardona, Ponzo, Nizio and Ashesh Dave May 10-14, 2010	54372	3,238.70
08-Jun-10	Meghan Carter-Travel to New York, NY for deposition of Sandipkumar Patel May 17-18, 2010	54758	1,538.09
08-Jun-10	Meghan Carter-Travel to Morgantown, WV for P. Latzo and C. Koon May 20-21, 2010	54760	915.45
08-Jun-10	Meghan Carter-Travel to Irvine, CA for deposition of Apruva Patel May 24-25, 2010	54761	1,944.26
21-Jun-10	Meghan Carter-Travel to Savannah, GA to meet with expert Jim Farley June 8, 2010	55180	8.55
21-Jun-10	Meghan Carter-Travel to Newark, NJ for Digitek plant inspection and meeting with experts June 2-4, 2010	55181	1,632.99
23-Jun-10	Fred Thompson-Travel to New York, NY for meeting with defendants June 14, 2010	55287	541.70
08-Jul-10	Fred Thompson-Travel to Cincinnati, OH for deposition of Dr. Nelson June 21-22, 2010	55619	1,119.31
08-Jul-10	Meghan Carter-Travel to New York, NY for depositions March 17, 2010-Supplemental	10186045	2.14
08-Jul-10	Meghan Carter-Travel to New York, NY for deposition of Jasmine Shah March 26, 2010-Supplemental	10186046	132.83
08-Jul-10	Meghan Carter-Travel to Boston, MA for deposition of Marc Semigran June 22-23, 2010	55622	1,180.11
22-Jul-10	Meghan Carter-Travel to Newark, NJ for depo preparation and depositions of Summa and Kenny June 28-July 1, 2010	56026	3,968.37
27-Jul-10	Fred Thompson-Travel to Cleveland, OH for settlement discussions July 20-21, 2010	56162	935.73
05-Aug-10	Meghan Carter-Travel to Irvine, CA for deposition of Apurva Paltel May 25-26, 2010-Supplemental	10187060	36.13
05-Aug-10	Meghan Carter-Conference room for deposition of Phyllis Lambridis June 17, 2010	10187061	593.72
10-Aug-10	Meghan Carter-Travel to Cleveland, OH for settlement discussions July 20-21, 2010	56525	1,362.74

Motley Rice MDL Held Expenses

10-Aug-10	Fred Thompson-Travel to Cleveland, OH for settlement discussions July 28-29, 2010	56526	1,640.47
10-Aug-10	Fred Thompson-Travel to Charleston, WV for status conference with Judge Goodwin August 4-5, 2010	56531	2,286.18
17-Aug-10	Meghan Carter-Travel to Cleveland, OH for settlement discussions July 28-29, 2010	56729	1,311.01
17-Aug-10	Meghan Carter-Travel to Charleston, WV for status conference with Judge Goodwin August 4-5, 2010	56730	934.15
17-Aug-10	Fred Thompson-Travel to Cleveland, OH for settlement discussions July 28-29, 2010	56739	969.17
20-Aug-10	Meghan Carter-Travel to Cleveland, OH for settlement discussions August 10-11, 2010	56823	1,316.33
01-Sep-10	Fred Thompson-Travel to Philadelphia, PA for PSC meeting August 17-19, 2010	57126	811.29
01-Sep-10	Meghan Carter-Travel to Philadelphia, PA for PSC meeting August 18-19, 2010	57129	906.11
24-Sep-10	Fred Thompson-Travel to Charleston, WV for status conference (Flight Cancelled in ATL)-return home on September 8, 2010	57750	627.89
29-Sep-10	Meghan Carter-Travel to Charleston, WV for status conference; flight cancelled	57841	48.36
28-Oct-10	Fred Thompson-Travel to Charleston, WV for status conference on October 19-20, 2010	58746	973.38
28-Oct-10	Fred Thompson-Travel to Philadelphia, PA for status conference and strategy meeting with co-counsel on October 11-13, 2010	58747	3,106.62
28-Oct-10	Meghan Carter-Travel to Charleston, WV for status conference with Judge Goodwin on October 19-20, 2010	58785	1,187.51
22-Nov-10	Meghan Carter-Travel to Charleston, WV for hearing on November 16-17, 2010	59410	902.50
17-Dec-10	Meghan Carter-Travel to Charleston, WV for status conference on September 8, 2010-Supplemental	10192218	591.89
09-Feb-11	Meghan Carter-Travel to Savannah, GA to meet with expert Jim Farley for his deposition January 18-19, 2011	61438	443.49
18-Sep-08	FedEx-Marissa Bessis, Motley Rice to Kathy Brown for Teresa Torisev, Wexler Toriseva Wallace on 20080908 (796081839869)	10163450	14.78

Postage

Motley Rice MDL Held Expenses

FedEx-Marissa Bessis, Motley Rice to John Kowalski, P.h.D. on 20081120 12-Dec-08 (796131333590)	10166685	15.69
FedEx-Marissa Bessis, Motley Rice to Denise Thomas, Bell & Bands on 26-Jan-09 20090102 (797221022412)	10168187	12.64
FedEx-Staci Palmer Barra, MOTLEY RICE LLC to Matthew McMullin, Dir. 26-Jan-09 of Tech, NMS Labs, Inc. on 20090105 (797224822939)	10168187	23.56
FedEx-Staci Palmer Barra, MOTLEY RICE LLC to Matthew McMullin, Dir. 26-Jan-09 of Tech, NMS Labs, Inc. on 20090105 (797225277913)	10168187	12.74
FedEx-Marissa Bessis, Motley Rice to Denise Thomas, Bell & Bands on 25-Feb-09 20090213 (796342696047)	10169220	11.97
FedEx-Marissa Bessis, Motley Rice to Denise Thomas, Bell & Bands on 10-Jun-09 20090515 (797600280593)	10172844	11.85
FedEx-Sandy Summers, MOTLEY RICE to Downie, Ericka, Shook, Hardy & 17-Aug-09 Bacon on 20090731 (797811738162)	10174797	11.04
FedEx-STEFFEN MOERITZ, MOTLEY RICE LLC to Cynthia Whiteman, 11-Nov-09 Crivella West on 20091023 (797046103462)	10177526	12.74
FedEx-Marissa Bessis, Motley Rice to Lisa Cook, on 20091104 11-Nov-09 (796093024033)	10177526	12.56
FedEx-Sandy Summers, MOTLEY RICE to Rennillo Deposition & Discover 29-Dec-09 on 20091204 (793072186703)	10178904	11.42
FedEx-Sandy Summers, MOTLEY RICE to Meghan Carter - Hotel Guest 12, 29-Dec-09 Waldorf Astoria Hotel on 20091211 (793093604234)	10178904	90.74
FedEx-Sandy Summers, MOTLEY RICE to Gilkow Technologies, Inc. on 29-Dec-09 20091204 (798192990932)	10178904	13.96
FedEx-Meghan Carter, Waldorf Astoria Hotel to Sandy Summers, MOTLEY 29-Dec-09 RICE on 20091216 (798214479336)	10178904	77.10
FedEx-Marissa Bessis, Motley Rice to Debbie Zeigler, Reich and Binstock on 19-Feb-10 20100209 (793256181365)	10180899	12.91
FedEx-Elizabeth Smith, Motley Rice LLC to Fred Thompson, Motley Rice 11-Mar-10 LLC on 20100211 (798382473194)	10181731	24.63
FedEx-Marissa Bessis, Motley Rice to Mike McGown on 20100326 09-Apr-10 (798514413661)	10182893	14.34

Motley Rice MDL Held Expenses

	FedEx-Marissa Bessis, Motley Rice to Russ Somma, on 20100405		
16-Apr-10	(798540086480)	10183167	16.20
	FedEx-Marissa Bessis, Motley Rice to Mike McGown, on 20100407		
16-Apr-10	(798548338167)	10183167	21.87
	FedEx-Marissa Bessis, Motley Rice to Edward F. Blizzard, Esquire, Blizzard,		
16-Apr-10	McCarthy & Nabers LL on 20100407 (798548399158)	10183167	21.87
	FedEx-Marissa Bessis, Motley Rice to Russ Somma, on 20100521		
02-Jun-10	(793565812253)	10184728	13.71
	FedEx-Marissa Bessis, Motley Rice to Brad Miller, Durbin, Larimore and		
06-Jul-10	Bialick, on 20100616 (798766501457)	10185942	13.42
	FedEx-Marissa Bessis, Motley Rice to Marc Semigran, M.D., on 20100622		
06-Jul-10	(798784037019)	10185942	14.67
	FedEx-Marissa Bessis, Motley Rice to Attn: Accounting, Smart Consulting		
23-Sep-10	Group on 20100831 (796203195698)	10188766	13.59
	FedEx-Marissa Bessis, Motley Rice to Denise DeLongis, Spyglass on		
23-Sep-10	20100913 (796240041601)	10188766	16.20
	FedEx-Marissa Bessis, Motley Rice to Prof. Lynn A. Baker, on 20100913		
23-Sep-10	(796240097306)	10188766	17.36
	FedEx-Marissa Bessis, Motley Rice to Ms. Wilma Lois Fuselier (Pro S, on		
26-Oct-10	20101008 (793994593153)	10190082	17.11
	FedEx-Marissa Bessis, Motley Rice to Ms. Hattie Phipps (Pro Se), on		
26-Oct-10	20101008 (796326612081)	10190082	17.11
	FedEx-Marissa Bessis, Motley Rice to Mr. Douglas Dutcher, on 20101008		
26-Oct-10	(793994515870)	10190082	16.47
	FedEx-Marissa Bessis, Motley Rice to Mr. Robert Eldridge, Jr. (Pro, on		
26-Oct-10	20101008 (796326639114)	10190082	22.56
Supplies			
	30-Mar-10 CDW Direct, LLC-500 GB Portable USB Hard Drives (2)	52942	218.15
	American Express-Jane Cothran-CDW purchase of 3 320GB USB portable		
07-Apr-10	hard drives	10182775	268.92
Telephone			
	22-Dec-08 AT&T TeleConference Services-November 2008 conference calls	41250	15.09
	23-Jan-09 AT&T TeleConference Services-December billing	42049	196.05
	27-Feb-09 AT&T Teleconference Services-January Teleconference Calls	42906	165.86
	08-Apr-09 AT&T TeleConference Services-Teleconference calls February 2009	43892	102.82

Motley Rice MDL Held Expenses

23-Apr-09 AT&T TeleConference Services-March conference calls	44313	69.33
23-Apr-09 AT&T TeleConference Services-March conference calls	44313	13.11
23-Apr-09 AT&T TeleConference Services-March conference calls	44313	29.95
20-May-09 AT&T TeleConference Services-April 2009 conference calls	44961	151.42
10-Jul-09 AT&T TeleConference Services-May 2009 teleconference calls	46300	73.78
27-Jul-09 AT&T TeleConference Services-June teleconference charges	46636	494.14
28-Sep-09 AT&T Teleconference Services-August Calls	48103	20.84
28-Sep-09 AT&T Teleconference Services-August Calls	48103	43.08
28-Sep-09 AT&T Teleconference Services-July Calls	48103	238.15
28-Oct-09 AT&T TeleConference Services- Conference Calls-October 2009	48875	111.33
28-Oct-09 AT&T TeleConference Services- Conference Calls-October 2009	48875	13.26
02-Dec-09 AT&T TeleConference Services- November Invoice	49709	62.96
02-Dec-09 AT&T TeleConference Services- November Invoice	49709	11.78
29-Dec-09 AT&T TeleConference Services- Conference calls December Invoice	50312	149.42
18-Feb-10 AT&T TeleConference Services-December 2009 conference call(s)	51754	13.96
18-Feb-10 AT&T TeleConference Services-December 2009 conference call(s)	51754	30.81
17-Mar-10 AT&T TeleConference Services-January 2010 teleconferences	52656	61.51
17-Mar-10 AT&T TeleConference Services-January 2010 teleconferences	52656	7.86
29-Apr-10 AT&T Teleconference-March 2010 conference calls	53801	5.87
29-Apr-10 AT&T Teleconference-March 2010 conference calls	53801	78.02
25-May-10 AT&T Teleconferce Services-April 2010 teleconferences	54414	40.17
23-Jun-10 AT&T Teleconference Services-May 2010 teleconference charge(s)	55292	10.37
27-Jul-10 AT&T TeleConference-June 2010 teleconference services	56154	18.45
29-Oct-10 AT&T Teleconference Services-July, August and September calls	58801	342.57
AT&T Teleconference Services-Acct #00117144-00001-October 2010		
22-Dec-10 teleconference call(s)	60215	3.86
Copying (in house)		
28-Jul-08 16	0.00	3.68
28-Jul-08 55	0.00	12.65
28-Jul-08 98	0.00	22.54
28-Jul-08 7	0.00	1.61
20-Aug-08 12	0.00	2.76
09-Oct-08 1	0.00	0.23
31-Oct-08 8	0.00	1.84

Motley Rice MDL Held Expenses

20-Nov-08 1	0.00	0.23
03-Dec-08 1	0.00	0.23
08-Dec-08 6	0.00	1.38
08-Dec-08 10	0.00	2.30
11-Dec-08 1	0.00	0.23
11-Dec-08 1	0.00	0.23
02-Jan-09 2	0.00	0.46
09-Jan-09 43	0.00	9.89
26-Jan-09 4	0.00	0.92
23-Feb-09 70	0.00	16.10
05-Mar-09 4	0.00	0.92
12-Mar-09 25	0.00	5.75
18-Mar-09 115	0.00	26.45
31-Mar-09 3	0.00	0.69
13-Apr-09 42	0.00	9.66
13-Apr-09 18	0.00	4.14
14-Apr-09 305	0.00	70.15
16-Apr-09 14	0.00	3.22
20-Apr-09 3	0.00	0.69
20-Apr-09 2	0.00	0.46
04-May-09 7	0.00	1.61
07-May-09 3	0.00	0.69
15-May-09 8	0.00	1.84
18-May-09 64	0.00	14.72
18-May-09 97	0.00	22.31
19-May-09 184	0.00	42.32
19-May-09 141	0.00	32.43
27-May-09 283	0.00	65.09
01-Jun-09 75	0.00	17.25
05-Jun-09 9	0.00	2.07
12-Jun-09 234	0.00	53.82
15-Jun-09 2	0.00	0.46
18-Jun-09 8	0.00	1.84
23-Jun-09 18	0.00	4.14

Motley Rice MDL Held Expenses

24-Jun-09 111	0.00	25.53
25-Jun-09 3	0.00	0.69
14-Jul-09 3	0.00	0.69
21-Jul-09 15	0.00	3.45
06-Aug-09 8	0.00	1.84
11-Aug-09 4	0.00	0.92
14-Aug-09 41	0.00	9.43
18-Aug-09 2	0.00	0.46
18-Aug-09 5	0.00	1.15
04-Sep-09 10	0.00	2.50
04-Sep-09 2	0.00	0.50
04-Sep-09 3	0.00	0.75
04-Sep-09 138	0.00	34.50
04-Sep-09 1	0.00	0.25
08-Sep-09 1	0.00	0.25
11-Sep-09 7	0.00	1.75
05-Oct-09 542	0.00	135.50
06-Oct-09 52	0.00	13.00
06-Oct-09 1	0.00	0.25
06-Oct-09 1	0.00	0.25
15-Oct-09 2	0.00	0.50
20-Oct-09 48	0.00	12.00
20-Oct-09 549	0.00	137.25
20-Oct-09 210	0.00	52.50
22-Oct-09 551	0.00	137.75
22-Oct-09 64	0.00	16.00
23-Oct-09 24	0.00	6.00
23-Oct-09 236	0.00	59.00
23-Oct-09 98	0.00	24.50
23-Oct-09 2	0.00	0.50
26-Oct-09 4	0.00	1.00
26-Oct-09 129	0.00	32.25
27-Oct-09 40	0.00	10.00
29-Oct-09 1	0.00	0.25

Motley Rice MDL Held Expenses

30-Oct-09 2	0.00	0.50
03-Nov-09 4	0.00	1.00
12-Nov-09 5	0.00	1.25
12-Nov-09 4	0.00	1.00
16-Nov-09 3	0.00	0.75
17-Nov-09 30	0.00	7.50
18-Nov-09 28	0.00	7.00
18-Nov-09 20	0.00	5.00
18-Nov-09 84	0.00	21.00
19-Nov-09 8	0.00	2.00
19-Nov-09 3	0.00	0.75
25-Nov-09 2	0.00	0.46
25-Nov-09 10	0.00	2.30
25-Nov-09 5	0.00	1.15
25-Nov-09 2	0.00	0.46
25-Nov-09 1	0.00	0.23
25-Nov-09 6	0.00	1.38
02-Dec-09 12	0.00	2.76
02-Dec-09 39	0.00	8.97
02-Dec-09 1	0.00	0.23
03-Dec-09 4	0.00	0.92
03-Dec-09 1	0.00	0.23
04-Dec-09 4	0.00	0.92
04-Dec-09 3	0.00	0.69
04-Dec-09 126	0.00	28.98
04-Dec-09 167	0.00	38.41
04-Dec-09 14	0.00	3.22
04-Dec-09 246	0.00	56.58
08-Dec-09 2	0.00	0.46
10-Dec-09 2	0.00	0.46
10-Dec-09 1	0.00	0.23
11-Dec-09 58	0.00	13.34
11-Dec-09 96	0.00	22.08
11-Dec-09 106	0.00	24.38

Motley Rice MDL Held Expenses

11-Dec-09 12	0.00	2.76
15-Dec-09 321	0.00	73.83
15-Dec-09 2	0.00	0.46
17-Dec-09 2	0.00	0.46
18-Dec-09 4	0.00	0.92
18-Dec-09 1	0.00	0.23
29-Dec-09 3	0.00	0.69
12-Jan-10 2	0.00	0.46
14-Jan-10 1	0.00	0.23
18-Jan-10 24	0.00	5.52
19-Jan-10 18	0.00	4.14
20-Jan-10 5	0.00	1.15
22-Jan-10 2	0.00	0.46
22-Jan-10 204	0.00	46.92
25-Jan-10 28	0.00	6.44
27-Jan-10 1	0.00	0.23
29-Jan-10 12	0.00	2.76
01-Feb-10 2	0.00	0.46
08-Feb-10 10	0.00	2.30
11-Feb-10 139	0.00	31.97
11-Feb-10 9	0.00	2.07
16-Feb-10 9	0.00	2.07
16-Feb-10 6	0.00	1.38
17-Feb-10 2	0.00	0.46
22-Feb-10 9	0.00	2.07
22-Feb-10 3	0.00	0.69
23-Feb-10 2	0.00	0.46
03-Mar-10 1	0.00	0.23
03-Mar-10 1	0.00	0.23
03-Mar-10 14	0.00	3.22
03-Mar-10 14	0.00	3.22
04-Mar-10 30	0.00	6.90
04-Mar-10 28	0.00	6.44
04-Mar-10 1	0.00	0.23

Motley Rice MDL Held Expenses

08-Mar-10 16	0.00	3.68
08-Mar-10 1	0.00	0.23
09-Mar-10 1	0.00	0.23
10-Mar-10 152	0.00	34.96
10-Mar-10 363	0.00	83.49
10-Mar-10 450	0.00	103.50
10-Mar-10 44	0.00	10.12
11-Mar-10 460	0.00	105.80
11-Mar-10 278	0.00	63.94
12-Mar-10 230	0.00	52.90
12-Mar-10 12	0.00	2.76
17-Mar-10 2	0.00	0.46
19-Mar-10 20	0.00	4.60
19-Mar-10 7	0.00	1.61
22-Mar-10 14	0.00	3.22
24-Mar-10 21	0.00	4.83
31-Mar-10 36	0.00	8.28
01-Apr-10 6	0.00	1.38
05-Apr-10 24	0.00	5.52
06-Apr-10 27	0.00	6.21
08-Apr-10 1	0.00	0.23
09-Apr-10 39	0.00	8.97
12-Apr-10 14	0.00	3.22
12-Apr-10 14	0.00	3.22
12-Apr-10 202	0.00	46.46
12-Apr-10 32	0.00	7.36
12-Apr-10 278	0.00	63.94
12-Apr-10 30	0.00	6.90
12-Apr-10 83	0.00	19.09
12-Apr-10 9	0.00	2.07
12-Apr-10 123	0.00	28.29
13-Apr-10 36	0.00	8.28
13-Apr-10 2	0.00	0.46
13-Apr-10 3	0.00	0.69

Motley Rice MDL Held Expenses

13-Apr-10 10	0.00	2.30
14-Apr-10 3	0.00	0.69
16-Apr-10 2	0.00	0.46
16-Apr-10 2	0.00	0.46
20-Apr-10 2	0.00	0.46
20-Apr-10 2	0.00	0.46
21-Apr-10 1	0.00	0.23
21-Apr-10 20	0.00	4.60
26-Apr-10 2	0.00	0.46
27-Apr-10 23	0.00	5.29
28-Apr-10 1	0.00	0.23
29-Apr-10 32	0.00	7.36
29-Apr-10 1	0.00	0.23
29-Apr-10 1	0.00	0.23
29-Apr-10 1	0.00	0.23
29-Apr-10 1	0.00	0.23
29-Apr-10 6	0.00	1.38
29-Apr-10 1	0.00	0.23
29-Apr-10 5	0.00	1.15
29-Apr-10 1	0.00	0.23
29-Apr-10 8	0.00	1.84
30-Apr-10 1	0.00	0.23
30-Apr-10 6	0.00	1.38
03-May-10 1	0.00	0.23
03-May-10 3	0.00	0.69
04-May-10 1	0.00	0.23
05-May-10 8	0.00	1.84
05-May-10 1	0.00	0.23
05-May-10 1	0.00	0.23
21-May-10 18	0.00	4.14
21-May-10 3	0.00	0.69
25-May-10 10	0.00	2.30
28-May-10 13	0.00	2.99
07-Jun-10 159	0.00	36.57

Motley Rice MDL Held Expenses

11-Jun-10 4	0.00	0.92
17-Jun-10 16	0.00	3.68
02-Jul-10 18	0.00	4.14
02-Jul-10 7	0.00	1.61
19-Jul-10 32	0.00	7.36
21-Jul-10 28	0.00	6.44
27-Jul-10 17	0.00	3.91
27-Jul-10 19	0.00	4.37
03-Aug-10 26	0.00	5.98
05-Aug-10 23	0.00	5.29
09-Aug-10 22	0.00	5.06
10-Aug-10 4	0.00	0.92
13-Aug-10 22	0.00	5.06
09-Sep-10 8	0.00	1.84
24-Sep-10 33	0.00	7.59
08-Oct-10 5	0.00	1.15
18-Oct-10 12	0.00	2.76
15-Dec-10 2	0.00	0.46
13-Jan-11 22	0.00	5.06
01-Feb-11 76	0.00	17.48
01-Feb-11 8	0.00	1.84
01-Feb-11 76	0.00	17.48
01-Feb-11 8	0.00	1.84
06-Feb-11 76 Duplicate 2.1.2011	0.00	-17.48
06-Feb-11 8 Duplicate 2.1.2011	0.00	-1.84
07-Feb-11 3	0.00	0.69
Postage		
30-Jul-08 Postage for July 23-29, 2008	0.00	15.96
29-Dec-08 Postage for December 17-23, 2008	0.00	0.84
15-Apr-09 Postage April 8-14, 2009	0.00	6.23
13-May-09 Postage May 6-12, 2009	0.00	4.53
21-Oct-09 Postage October 14-20, 2009	0.00	0.44
28-Oct-09 Postage October 21-27, 2009	0.00	4.88

Motley Rice MDL Held Expenses

02-Dec-09 Postage November 25-December 1, 2009	0.00	0.44
09-Dec-09 Postage December 2-8, 2009	0.00	3.66
30-Dec-09 Postage December 23-29, 2009	0.00	0.44
20-Jan-10 Postage January 13-19, 2010	0.00	0.44
11-Feb-10 Postage February 3-9, 2010	0.00	0.61
10-Mar-10 Postage March 3-9, 2010	0.00	0.44
17-Mar-10 Postage March 10-16, 2010	0.00	0.61
28-Apr-10 Postage April 21-27, 2010	0.00	0.44
27-May-10 Postage May 19-25, 2010	0.00	15.86
09-Sep-10 Postage September 1-7, 2010	0.00	595.88
08-Dec-10 Postage December 1-7, 2010	0.00	0.88

Supplies

02-Dec-08 Supplies	0.00	14.76
04-Feb-09 Supplies	0.00	7.17
07-Apr-09 Supplies	0.00	51.96
05-May-09 Supplies	0.00	15.48
02-Jul-09 Supplies	0.00	39.68
17-Aug-09 Supplies	0.00	11.61
09-Sep-09 Supplies	0.00	23.87
10-Oct-09 Supplies	0.00	5.91
05-Jan-10 Supplies	0.00	13.62
12-Feb-10 Supplies	0.00	17.97
02-Apr-10 Supplies	0.00	14.89
03-May-10 Supplies April 2010	0.00	403.45
02-Jun-10 Supplies May 2010	0.00	23.65
02-Aug-10 Supplies July 2010	0.00	32.25
01-Oct-10 Supplies	0.00	39.10
04-Feb-11 January 2011 Supplies	0.00	6.14
04-Feb-11 January 2011 Supplies	0.00	12.90

Imaging Costs

28-Jul-08 19	0.00	3.23
19-Dec-08 1	0.00	0.17

Motley Rice MDL Held Expenses

19-Dec-08 4	0.00	0.68
09-Jan-09 3	0.00	0.51
13-Jan-09 2	0.00	0.34
14-Jan-09 3	0.00	0.51
14-Jan-09 1	0.00	0.17
16-Jan-09 4	0.00	0.68
26-Jan-09 4	0.00	0.68
02-Mar-09 9	0.00	1.53
30-Mar-09 8	0.00	1.36
09-Apr-09 44	0.00	7.48
13-Apr-09 25	0.00	4.25
13-Apr-09 21	0.00	3.57
17-Apr-09 20	0.00	3.40
20-Apr-09 46	0.00	7.82
01-May-09 13	0.00	2.21
01-May-09 8	0.00	1.36
05-May-09 21	0.00	3.57
05-May-09 6	0.00	1.02
28-May-09 2	0.00	0.34
03-Jun-09 Scan Center May 2009	0.00	10.00
04-Jun-09 6	0.00	1.02
09-Jun-09 1	0.00	0.17
09-Jun-09 38	0.00	6.46
09-Jun-09 62	0.00	10.54
15-Jun-09 2	0.00	0.34
26-Jun-09 6	0.00	1.02
26-Jun-09 54	0.00	9.18
17-Jul-09 1	0.00	0.17
21-Jul-09 5	0.00	0.85
24-Jul-09 5	0.00	0.85
18-Aug-09 2	0.00	0.34
24-Aug-09 72	0.00	12.24
24-Aug-09 28	0.00	4.76
26-Aug-09 4	0.00	0.68

Motley Rice MDL Held Expenses

Printing Costs

10-Sep-09 Copy Center August 2009	0.00	2.89
11-May-10 Copy Center April 2010	0.00	688.50

Total:		170,061.52
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EXHIBIT 5

Motley Rice LLC

28 Bridgeside Blvd.

2/15/11 01:45 PM

From 1/1/01**Thru 2/10/11**

Luce, Joan L.
 Sheffield Bay Assisted Living
 Bay City, MI 48706

Re: Luce, Joan L. (425031-0)

Professional Services		
As per Time Exhibit Attached.....		\$0.00
Costs		
Deposition Transcripts	1,788.25	
Experts	2,000.00	
Filing Fees	350.00	
Medical Records	1,535.83	
Online Research	12.98	
Other Professionals	8.68	
Out of Town Travel	4,906.75	
Postage	74.40	
Subpoena Fees	185.00	
Copying Charges	919.88	
Imaging Charges	67.95	
Postage Charges	42.26	
Printing	706.10	
Supply Charges	36.60	
Total Costs.....		\$12,634.68
Total Invoice.....		\$12,634.68

EXHIBIT 6

Motley Rice Class Expenses

Date	Description	Check Number	Amount
14-Oct-09	Meghan Johnson Carter- Travel to Louisville, KY for Lange deposition on October 5-6, 2009	48482	1,176.39

EXHIBIT 7

Task Code Description	Bill Date	AP Distribution Description	AP Check Number	Bill Amount
Copying		fees during Atlanta, GA trip September 15-Mar-10 17, 2009	10181827	115.00
Court Reporter		Lisa Cook, RPR-RMR-Motions hearing transcript 11/20/09	49906	306.60
Deposition Transcripts		Golkow Technologies, Inc.- Original and certified copy of Transcript of Narendrakumar J. Patel deposition-Invoice #35535	49388	1,684.05
		Golkow Technologies, Inc.- Video services for deposition of Narendrakumar J Patel-Invoice #35940	49388	1,005.00
		Rennillo Deposition & Discovery- Trial Case Depo-Peter Konek	49737	581.22
		Rennillo Deposition & Discovery- Trial Case Depo-Bobby Milligan	49737	1,213.39
		Rennillo Deposition & Discovery- Trial Case Depo-Michael Pasken	49737	664.51
		Rennillo Deposition & Discovery- Trial Case Depo- Dale Campbell	49737	558.21
		Rennillo Deposition & Discovery- Trial Case Depo- Willie Mae Wilburn	49737	672.13
		Rennillo Deposition & Discovery- Trial Case Depo- Calude Jarrell	49737	251.42
		Rennillo Deposition & Discovery- Trial Case Depo-Karen Sheahan	49737	981.96
		Rennillo Deposition & Discovery- Trial Case Depo- Connie Flaherty	49737	654.27
		Rennillo Deposition & Discovery- Trial Case Depo-Jacquelyn Fox	49737	767.24
		Rennillo Deposition & Discovery- Trial Case Depo- Dr. Steven Williams	49737	421.23
		Rennillo Deposition & Discovery- Trial Case Depo- Scottie Vega	49737	559.21
		Rennillo Deposition & Discovery- Trial Case Depo-Alan Chambers	49737	623.16
		Rennillo Deposition & Discovery- Trial Case Depo-Alice Maroon	49737	361.95
		Rennillo Deposition & Discovery- Trial Case Depo- William J Young	49737	1,251.04
		Rennillo Deposition & Discovery- Trial Case Depo- Bobbi J Myers	49737	843.21
		Rennillo Deposition & Discovery- Trial Case Dep- Richard Mason, MD	49737	440.46
		Rennillo Deposition & Discovery- Trial Case Depo-Regina Estep	49737	1,037.75
		Depo- Kwame Adjei, Video Services, etc	49738	1,355.00
		Depo- Kwame Adjei, Exhibits, transcripts, etc.	49738	679.32
		Depo-Richard Mayo, exhibits, transcripts, etc	49738	454.70
		depo- Richard Mayo- Additional hours of video	49738	440.00

	depo-Eamonn Murphy, transcript and exhibits	49738	1,270.06
	Golkow Technologies, Inc.- Corporate		
03-Dec-09	depo- Eamonn Murphy, Video services	49738	935.00
	Golkow Technologies, Inc.- Corporate		
03-Dec-09	depo- Lourdes Reyes- videotaping	49738	145.00
	depo- Lourdes Reyes- exhibits,		
03-Dec-09	transcript	49738	141.32
	Golkow Technologies, Inc.- Corporate		
03-Dec-09	depo- Lourdes Reyes- video services	49738	1,175.00
	Golkow Technologies, Inc.- Corporate		
03-Dec-09	depo- Bakul Shah- video services	49738	715.00
	depo- Bakul Shah, transcript, exhibits,		
03-Dec-09	etc	49738	964.00
	Golkow Technologies, Inc.- Corporate		
03-Dec-09	depo- Mark Toole- video services	49738	460.00
	depo- Mark Toole- exhibits, transcript,		
03-Dec-09	etc	49738	432.70
Experts			
20-Nov-08	John B. Kowalski, Ph.D.-Retainer	40328	10,000.00
	Jeffrey Rubin, MD- Retainer Fee-		
12-Oct-09	Medical Expert	48428	2,000.00
04-Dec-09	Mark I. Furman, MD-Expert services	49788	1,400.00
24-Feb-10	SpyGlass, Inc.-Expert retainer fee	51956	10,000.00
13-May-10	Sommatech, LLC- Expert Retainer Fee	54178	10,000.00
	Marc Semigran MD-Expert review and		
17-Jun-10	report	55103	11,000.00
30-Aug-10	Smart Consulting Group-Expert fees	57033	82,007.63
	SpyGlass, Inc.- Invoice 1048-Expert		
09-Sep-10	witness fee	57302	20,210.00
	SpyGlass, Inc.- Invoice 1032- Expert		
09-Sep-10	witness fee	57302	11,180.00
	SpyGlass, Inc.- Invoice 1031- expert		
09-Sep-10	witness fee	57302	28,595.00
	Lynn A. Baker- Expert witness fee for		
09-Sep-10	Settlement process	57303	25,000.00
13-Oct-10	SpyGlass, Inc.-Expert witness fee	58231	5,632.14
	Marc Semigran MD-Expert time for		
02-Nov-10	deposition and consultation	58908	9,500.00
	Meghan Johnson Carter-Whole Foods-		
05-Nov-09	PSC meeting 10/19/09	10177284	184.28
	Fred Thompson-Dinner for Digitek PSC		
25-Mar-10	March 9, 2010	52824	768.55
	Meghan Carter-Digitek PSC Lunch		
25-Mar-10	March 10, 2010	10182239	462.77
Other Charges			
	Meghan Johnson Carter-Banquet rooms		
08-Jul-09	and services for PSC Meeting	46247	2,570.34
	Meghan Johnson Carter-Conference		
	Room Charges in Atlanta, GA for		
05-Oct-09	meeting/training on September 17, 2009	10176260	1,262.96
	deposition of Jasmine Shah March 26,		
14-Apr-10	2010	10183104	3,538.08
Trial Transcripts			
	Lisa Cook, RPR-RMR-Fee for hearing		
16-Oct-09	transcript	48561	162.45
Witness Fees			

	10-Mar-10 mileage	52318	55.50
	20-Apr-10 Apurva Patel-Witness fee and mileage	53575	62.00
Service of Process	Nicoletti & Harris-Service of process-		
	10-Mar-10 Depo subpoena-Ashok Nigalaye	52319	170.00
	19-Apr-10 Nicoletti & Harris-Service-Nigalaye	53502	13.50

Total: 259,935.31

Reimbursements by PSC

	#####	Motley Rice LLC - reimbursement	510	-2,570.34
	#####	Motley Rice LLC - reimbursement	521	-67,063.19

Total Outstanding 190,301.78

IN RE: DIGITEK PRODUCTS LIABILITY LITIGATION

MDL NO. 1968

THIS DOCUMENT RELATED TO ALL CASES

AFFIDAVIT

Being duly sworn, I submit as follows:

1. My name is Teresa C. Toriseva.
2. I am over the age of 18.
3. I am an attorney practicing in Wheeling, West Virginia.
4. I filed a Petition with the Judicial Panel for Multi-District Litigation and argued for West Virginia to be selected as the venue for the Digitek MDL litigation. This argument ultimately prevailed and the case was assigned to the Honorable Judge Joseph R. Goodwin.
5. I was appointed as the Chair of the Plaintiffs Steering Committee for the Digitek MDL by Honorable Judge Joseph R. Goodwin.
6. Plaintiff, Thomas Beveridge (filed in the Kanawha Circuit Court, West Virginia, Case No. 08-C-273) was selected and set for trial and was helpful in moving the litigation on behalf of the plaintiffs. My time and expenses for this matter is included within my time report.
7. I have incurred substantial time and expenses with regard to the Digitek MDL. My time and expense reports are attached hereto. The total for my time in this matter is 282.10.

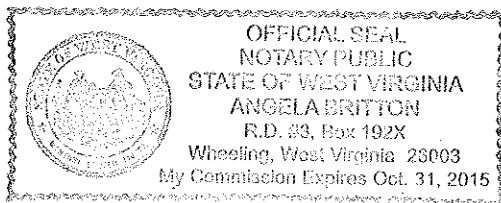
8. On May 29, 2009, pursuant to Pretrial Order Number 23, undersigned was granted her resignation as the Chair of the Plaintiffs Steering Committee for the Digitek MDL by Honorable Judge Joseph R. Goodwin
9. Further affiant sayeth naught.


Teresa C. Toriseva

STATE OF WEST VIRGINIA
COUNTY OF OHIO, to-wit:

I, Angela Britton, a Notary Public in and for the State and County aforesaid do hereby certify that Teresa C. Toriseva, whose name is signed to the foregoing Affidavit bearing the date of the 15th day of February, 2011, has this day acknowledged the same before me in my said county.

My commission expires October 31, 2015.



NOTARY SEAL


Notary Public

TERESA C. TORISEVA/TORISEVA LAW TIME

<u>Experts</u>	<u>DATE</u>	<u>Time</u>	<u>Description</u>
	8/15/2008	3	Teleconference with Dr. E. Don Nelson; Review CV
	8/18/2008	2	Consultation with Dr. Eugene DeBlasio, M.D. /Referral to John Setaro, M.D.
			Teleconference with Patricia Avery, Esq. RE: Cardiology Expert, Dr. Richard Grimm. Discuss qualifications as
	8/27/2008	0.8	Digitek Expert
	9/1/2008	3	Consultation with John Setaro, M.D.
			Research and Evaluation of Various Experts RE: Digitek - including Dr. Dajani, James O'Brien -
			Pharmacologist, Dr. Henry Bussey, Rodney G. Richmond, RPh, MS, CGP, FASCP, Peter Chyka, Pharm.D.,
	9/3/2008	6.9	Randall L. Tackett, Ph.D., and Matthew F. Muldoon, M.D.
	9/19/2008		Prepare for Counsel to Meet with Dr. John Kowalski consultant
	1/18/2009	0.1	Email with John Setaro, M.D. RE: Invoice
	TOTAL	15.8	

Organizational/PSC Prep (including pleadings, etc.)

	8/6/2008	1	Meeting with Carl Frankovitch RE: Digitek MDL
	8/8/2008	0.5	Email correspondence with Matt Morriarty RE: Meeting
	8/11/2008	2	Meet with Fred Thompson and Carl Frankovitch RE: Preparation of Conference Call with Defense Counsel
			Digitek Conference Call with Defense Counsel (Local and National) along with Carl Frankovitch and Fred
	8/14/2008	1	Thompson
	8/14/2008	0.3	Review Order RE: MDL Case Assignment with Judge Goodwin
	8/19/2008	1	Digitek MDL Organizational Conference Call
	8/20/2008	1.5	Digitek MDL Council Meeting
	8/20/2008	0.9	Digitek MDL Meeting with Carl Frankovitch and Conference call with Matt Dean
	8/21/2008	0.7	Review PTO#1
	8/22/2008	1	Teleconference with Carl Frankovitch and Troy Giatras RE: Digitek MDL
	8/25/2008	5	Prepare and Attend Digitek Plaintiff Counsel Meeting in Chicago, IL (including travel)
	8/26/2008	11.8	Prepare and Attend Digitek Plaintiff Counsel Meeting in Chicago, IL (including travel)
	8/26/2008	0.1	Review email from Tom P. Cartmell, Esq. RE: PSC Structure Support
	8/26/2008	0.1	Review email from Deborah B. McIlhenny, Esq. RE: PSC Structure Support
	8/26/2008	0.1	Review email from Shelly A. Sanford, Esq. RE: PSC Structure Support

8/26/2008	0.1 Review email from Jon Conlin of Cory Watson RE: PSC Structure Support
8/26/2008	0.1 Review email from Bruce Kingsdorf, Esq. of Barrios, Kingsdorf & Casteix, LLP RE: PSC Structure Support
8/28/2008	0.1 Review email from Patricia Avery, Esq. RE: PSC Structure Support
8/28/2008	0.1 Review email from Erick Rosemond, Esq. RE: PSC Structure Support
9/3/2008	1.5 Prepare and revise proposed Application for Lead Counsel
9/8/2008	0.8 Review Edits and Revise proposed Application for Lead Counsel
9/12/2008	0.6 Review CTO-1 and Order Lifting Stay of CTO-2 Email to Christina Nancarrow RE: Judge Goodwin correspondence RE: appointment of interim liaison
9/16/2008	0.2 counsel.
9/18/2008	1.3 Teleconference with Plaintiffs' counsel RE: Case Status including Experts
9/20/2008	0.2 Email with Fred Thompson RE: Dr. John and Kowalski expert consultants
9/26/2008	0.3 Review PTO#2
9/28/2008	0.5 Review email from Liaison counsel RE: agenda
9/29/2008	1.5 Review email from Matt Moriarty RE: Liaison counsel/teleconference with Plaintiffs' counsel
10/10/2008	0.3 Review PTO#3
10/17/2008	1 Teleconference with Plaintiffs' counsel RE: PSC Application and MDL status
10/20/2008	1.7 Prepare and File Application for Plaintiffs' Steering Committee
10/22/2008	1 Teleconference with Plaintiffs' counsel RE: Status
10/23/2008	1 Teleconference with Plaintiffs' counsel RE: status and PSC Application review Review Objection to the Appointment of Teresa Toriseva as Co-Lead Counsel; Teleconference with Plaintiff's
10/28/2008	1.7 counsel RE: Objection
10/29/2008	0.3 Review CTO-4
10/29/2008	2 Teleconference with Plaintiffs' counsel RE: Objection/status
11/3/2008	2 Various teleconferences with Plaintiffs' counsel RE: Support
11/5/2008	0.4 Review PTO#4
11/6/2008	1.5 Teleconference with co-counsel RE: organization of PSC
11/11/2008	3 Teleconference with co-counsel; review agenda and prepare for conference call with PSC
11/12/2008	0.4 Review CTO-5
11/13/2008	0.5 Review PTO#5
11/16/2008	1 Digitek PSC Conference Call
11/20/2008	1 Teleconference with Carl Frankovitch and Harry Bell RE: State Court proceedings
11/21/2008	0.7 Email to Counsel RE: Update as to Status of PSC/Digitek
11/21/2008	1.5 Teleconference with lead counsel RE: Expert status

11/21/2008	2 Review correspondence from State Court. Teleconference with Carl Frankovitch RE: Response
11/22/2008	0.3 Review email from Danny Becnel RE: PSC Appointment; Email to all lead counsel RE: Position
11/24/2008	0.4 Review PTO#6
12/1/2008	1 Teleconference with State Counsel and with Carl Frankovitch and Fred Thompson
12/2/2008	2.5 Teleconference with co-counsel RE: lab testing
12/3/2008	0.3 Review PTO#7
12/9/2008	0.4 Review email from Patricia Avery RE: Protective Order
12/10/2008	0.3 Review PTO#8
12/11/2008	1.5 Prepare Consumer Protection facts RE: Digitek Master Complaint
12/11/2008	0.6 Review Chemir Analytical Services RE: Digitek tablet testing/destructive testing
12/12/2008	2 Review Protective Order; Teleconference with Co-lead Counsel
12/12/2008	1.5 Conference call with co-counsel RE: Becnel Complaint
12/17/2008	1 Teleconference with Co-Lead Counsel RE: Funds/Status
12/18/2008	0.1 Review email from Meghan Johnson, Esq. RE: Draft search terms
12/18/2008	1 Teleconference with Patricia I. Avery, Esq. RE: Digitek corporate entities, etc./trademark/UDL product guides
12/18/2008	0.1 Review email from Patricia Avery, Esq. RE: Digitek corporate entities, etc./trademark/UDL product guides
12/19/2008	0.1 Review correspondence from Fred Thompson, Esq. RE: Plaintiffs' search terms.
12/22/2008	0.5 Review of State Court Order
1/5/2009	0.7 Review proposed Preservation Order
1/7/2009	0.4 Review PTO#9 and CTO-7
1/8/2009	1.3 Review Preservation Order/Protection Order
1/9/2009	1 Conference call with co-counsel
1/15/2009	0.6 Digitek PSC Conference Call
1/16/2009	1.5 Review of Master Complaint
1/28/2009	1 Digitek PSC Conference Call
1/30/2009	1.5 Digitek PSC Status Conference Call
2/2/2009	2 Draft/Edit Digitek Master Complaint
2/3/2009	0.3 Review PTO#10 and 11
2/6/2009	0.6 Review Master Complaint and PTO#12
2/6/2009	0.4 Teleconference with Co-Counsel
2/10/2009	1.4 Review Complaint and Preservation Order

	Teleconference RE: Case Management Scheduling Order and PTO#13; Review Case Management Scheduling
2/11/2009	3 Order and PTO#13 prior to call
2/13/2009	1 Digitek PSC Conference Call
2/17/2009	0.2 Review PTO#14
2/19/2009	0.4 Review Draft Plaintiff Fact Sheet
2/20/2009	0.1 Review CTO-9
2/23/2009	0.3 Review Case Management Order and Scheduling Order
2/26/2009	0.7 Digitek PSC Conference Call
3/2/2009	0.4 Teleconference with co-counsel RE: drug testing
3/3/2009	4 Travel to attend Digitek Conference in Birmingham, AL (including travel)
3/4/2009	7.6 Attend Digitek Conference in Birmingham, AL (including travel)
3/6/2009	0.4 Review Tolling Agreement as well as PTO#15 and PTO#16
3/11/2009	0.5 Review State Court Order Setting Status Conference; Review PTO#17
3/16/2009	0.6 Review proposed Discovery Conduct Order and Tolling Agreement
3/17/2009	0.5 Digitek Conference Call
3/20/2009	0.3 Review PTO #18
3/25/2009	0.2 Review PTO#19
3/26/2009	1 Digitek PSC Conference Call
3/30/2009	1 Digitek Lead PSC Call
3/31/2009	1 Digitek Discovery Committee Call
4/13/2009	0.6 Digitek Lead PSC Call
4/13/2009	1 Review final Interrogatories and Requests for Production. Review PTO#20 and CTO-12
4/14/2009	1 Attend Digitek "GoToMeeting" Conference
4/27/2009	0.9 Digitek Conference Call
5/11/2009	0.5 Digitek Conference Call
5/13/2009	3 Attend Lexis Training for State Cases
5/14/2009	1 Teleconference with Co-lead
5/19/2009	0.2 Review PTO#22
8/26/2010	1.3 Digitek Conference Call RE: MDL status
TOTAL	116.3

Depositions (Case selected for trial - Thomas Beveridge)

	Email with Jaclyn Bryk RE: Timeframe for Depositions of Drs. Chiu and Commerci as well as the Plaintiff,
5/18/2010	0.1 Thomas Beveridge

	Email with Jaclyn Bryk RE: Notices of Hearings/Confirmation of depositions of Drs. Chiu and Commercia as
5/25/2010	0.1 well as the Plaintiff, Thomas Beveridge
6/18/2010	3 Prepare for Deposition of Dr. Edward Chiu
6/21/2010	4.3 Attend Deposition of Dr. Edward Chiu CLIENT: Beveridge, Thomas
6/22/2010	2.6 Meet with Thomas Beveridge RE: Preparation for Deposition
6/24/2010	5 Associate Attorney Prepare for Deposition of Client, Thomas Beveridge and of Dr. James L. Commerci
	Associate Attorney, Christopher Elswick, Esq.: Attend Deposition of Dr. James L. Commerci, M.D. CLIENT:
6/25/2010	4.2 Beveridge, Thomas
TOTAL	19.3

Status Conferences/Hearings

9/17/2008	9.1 Prepare and Attend Court Meeting with MDL Counsel (including travel)
10/6/2008	9.7 Prepare and Attend Digitek MDL Hearing (including travel)
10/10/2008	9.8 Prepare and Attend Pretrial Conference set by Judge Goodwin (including travel)
11/20/2008	9.1 Prepare and Attend Digitek State Court Hearing (including travel)
11/26/2008	9 Prepare and Attend Judge Goodwin Digitek Mandatory Meeting RE: PSC (including travel)
1/28/2009	9.5 Prepare and Attend Judge Goodwin Digitek Mandatory Meeting RE: PSC (including travel)
	Prepare and Attend Mandatory Appearance by Co-Lead and Liasion Counsel before Judge Stanley (including
2/25/2009	9.2 travel)
3/5/2009	9.4 Prepare and Attend Digitek Status Conference before Judge Goodwin (including travel)
4/29/2009	9 Attend Status Conference before Judge Goodwin (including travel)
TOTAL	83.8

San Francisco

	Review/Research appropriate procedure for filing Memorandum for Consolidation and Joinder with Kevin
6/30/2008	6 Clark and Willie Mae Wilburn file for Digitek JPML proceedings.
	Prepare and File Memorandum of Law in Support of Interested Party Response of Plaintiff Wanda Pearl
	Boyles for Joinder in the Motion of Kevin Clark and Willie Mae Wilburn Transfer and Coordination or
7/2/2008	7.4 Consolidation Under 28 U.S.C. 1407 (MDL 1968) - Filed before the JPML
	Prepare and File Interested Party Response of Plaintiff Wanda Pearl Boyles for Joinder in the Motion of Kevin
	Clark and Willie Mae Wilburn, Individually and on Behalf of Others Similarly Situated for Transfer and
7/7/2008	3.9 Coordination or Consolidation Under 28 U.S. C. 1407: Filed with JPML (MDL 1968)

		Prepare and File Interested Party Response of Leona Linen for Joinder in the Motion of Kevin Clark and Willie Mae Wilburn, Individually and on Behalf of Others Similarly Situated for Transfer and Coordination or
7/11/2008	1.3	Consolidation Under 28. U.S.C 1407
		Prepare and File Memorandum of Law in Support of Interested Party Response of Plaintiff Leona Linen for Joinder in the Motion of Kevin Clark and Willie Mae Wilburn Transfer and Coordination or Consolidation
7/11/2008	1.5	Under 28 U.S.C. 1407 (MDL 1968) - Filed before the JPML
		Prepare and File Interested Party Response of Joe Supenski for Joinder in the Motion of Kevin Clark and Willie Mae Wilburn, Individually and on Behalf of Others Similarly Situated for Transfer and Coordination or
7/11/2008	1.3	Consolidation Under 28. U.S.C 1407
		Prepare and File Memorandum of Law in Support of Interested Party Response of Plaintiff Joe Supinski for Joinder in the Motion of Kevin Clark and Willie Mae Wilburn Transfer and Coordination or Consolidation
7/11/2008	1.5	Under 28 U.S.C. 1407 (MDL 1968) - Filed before the JPML
7/26/2008: 7/31	24	Travel to San Francisco RE: Digitek Litigation Group Meeting, Plaintiffs' Counsel meetings RE: Digitek: Prepare and Attend Oral Argument RE: JPML hearing session RE: Digitek
TOTAL	46.9	
GRAND TOTAL	282.1	

Digitek**3600**

4/6/2009 Am. Ex.		meal expense	133.61
4/6/2009 Am. Ex.		Air Travel	241.76
4/27/2009 Am. Ex.	Delta Airlines	Cincinnati, Ohio status conference	502.20
4/30/2009 Am. Ex.	Marriott Charleston	04/28/09 - 04/29/09	227.05

1104.62

Bal.

WexlerWallace (submitted with Toriseva)

Travel: \$6,473.16

Meals for meeting : \$3,260.82

Experts: \$3,062.5

Other (meeting): \$3,716.63

Total: \$16,513.11

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE DIGITEK®
PRODUCTS LIABILITY LITIGATION**

MDL NO. 1968

THIS ACTION RELATES TO:

All Actions

**DECLARATION OF SCOTT WM WEINSTEIN
IN SUPPORT OF APPLICATION FOR AWARD
OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Scott Wm Weinstein, declare as follows:

1. I am a member of the firm Morgan and Morgan, P.A. (hereafter referred to as “Morgan and Morgan”). I am submitting this Declaration in support of my firm's application for an award of attorneys' fees in connection with my service on the Plaintiffs’ Steering Committee in the above-entitled action and the reimbursement of expenses incurred by my firm in the course of my service.

2. The testimony set forth in this declaration is based upon first-hand knowledge, about which I would and could testify competently in open court if called upon to do so, and on contemporaneously-generated records kept in the ordinary course of business.

3. I was appointed a member of the Plaintiffs’ Steering Committee in the above captioned matter by this Court on November 5, 2008, by Pretrial Order #4.

4. After my appointment by the Court as a member of the PSC, I was also appointed by the PSC itself to serve as co-chair of the class action subcommittee. The class action subcommittee was formed by the PSC to take the lead in evaluating any and all class claims asserted in actions transferred into the MDL and to prepare and file one or more pretrial motions for class certification as the PSC determined appropriate.

5. Morgan and Morgan is a civil trial law firm representing accident and injury victims as well as consumers and commercial clients nationwide. With more than 175 lawyers, and more than 800 employees, Morgan and Morgan is the largest plaintiffs' firm in the State of Florida and one of the largest in the nation. Morgan and Morgan has a dedicated National Consumer Class Action and Mass Torts Department staffed with lawyers committed to representing large numbers of individuals in MDL proceedings and class action cases throughout the country. I am the Managing Partner of the National Consumer Class Action and Mass Torts Department. Additional information about Morgan and Morgan and the lawyers of my department is attached hereto as Exhibit A.

6. Morgan and Morgan has been retained by numerous individuals to represent them in individual cases brought or to be brought against Defendants. In addition, hundreds of individuals contacted Morgan and Morgan seeking representation. Overall, thousands of hours of attorney and paralegal time have been expended by Morgan and Morgan in reviewing and processing both potential and actual clients' claims. The present declaration does not pertain to any of those individual cases, however. Instead, the present declaration concerns only time and expenses incurred by me and Morgan and Morgan as I discharged my obligations as a member of the PSC and represented all individuals whose claims were transferred to this Court in the MDL.

7. In connection with my service on the PSC, Morgan and Morgan spent a total of 551.6 attorney hours and a total of \$32,260.17 in costs, as further detailed in this declaration.

8. The total number of attorney hours outlined in this declaration were expended by Morgan and Morgan from November 5, 2008, the date of my appointment to the PSC, to the present. The total lodestar amount for the 551.6 attorney hours expended by Morgan and Morgan, based upon current rates, is \$290,860.00. The chart attached hereto as Exhibit B presents a summary of the time spent by me and by Morgan and Morgan attorneys assisting me

during this timeframe. The chart includes the name of each attorney who has worked on this matter, his or her title and current hourly billing rate, and the number of hours expended by each. The time reflected in this declaration was time actually spent, in the exercise of reasonable judgment, by the lawyers involved, and was prepared at my direction and from the firm's time records. The chart also breaks down the time spent by Morgan and Morgan attorneys by time spent doing PSC work related to MDL cases and by time spent doing PSC work related to class action cases.

9. This Declaration encompasses services performed over a slightly more than two-year period and includes time spent traveling to and attending PSC meetings, assisting in the development of the PSC's overall litigation strategy, and assisting the PSC in the prosecution of class action claims. In connection with the prosecution of class action claims, I, and attorneys under my supervision and control, assisted in the drafting of class related discovery, the review and analysis of documents and testimony related to class claims, and performed many hours of legal research in support of class certification. In addition, I, and the attorneys under my supervision and control, undertook substantial responsibility for the drafting of: a) a motion for class certification and supporting memorandum for six class cases, b) a reply memorandum in support of the motion for class certification, c) a motion for reconsideration of the order denying class certification and supporting memorandum of law, d) a reply memorandum in support of the motion for reconsideration, and e) a draft Rule 26(f) petition seeking permission to appeal (which petition ultimately was not filed given the resolution of this case). While the motion for class certification was ultimately not successful, it was a necessary component of the overall litigation strategy of the MDL proceeding and its filing was necessitated by the fact that numerous cases containing class action allegations were transferred to this Court.

10. Morgan and Morgan expended a total of \$32,260.17 in unreimbursed, held expenses in connection with my service on the PSC. These expenses are broken down as follows:

CONTRIBUTION TO PSC LITIGATION FUND	\$25,000.00
PHOTOCOPYING AND TELEPHONE.....	\$ 45.08
MEALS, LODGING AND TRAVEL	\$ 7,157.77
POSTAGE.....	\$ 20.36
ELECTRONIC RECORDS (PACER).....	\$ 36.96
TOTAL EXPENSES.....	\$32,260.17

11. The expenses incurred pertaining to my service on the PSC are reflected in the books and records of Morgan and Morgan. These books and records are prepared from expense vouchers and check receipts and are an accurate record of the expenses incurred.

I declare under penalties of perjury the foregoing is true and correct to the best of my knowledge and belief.

Executed this 11th day of February, 2011, at Ft. Myers, Florida.

/s/ Scott Wm Weinstein

EXHIBIT A



www.forthethepeople.com

Morgan & Morgan is a leading civil trial law firm representing accident and injury victims as well as consumers and commercial clients nationwide. With about 170 lawyers, and almost 1000 employees, Morgan & Morgan is the largest plaintiffs' firm in the State of Florida and one of the largest in the nation. Morgan & Morgan's principal office is in Orlando, Florida, but the firm has offices throughout Florida and has offices in Georgia, Mississippi, and Tennessee. Morgan & Morgan's experienced team of attorneys handle all types of personal injury and consumer protection claims, including car accidents, workers compensation, medical malpractice, nursing home abuse, product liability, slip and fall, denial of insurance benefits, Americans with Disabilities Act claims, employment discrimination claims, collection harassment, Social Security claims, general negligence and maritime injury claims. Morgan & Morgan also has a Business Trial Group that represents business owners and individuals and is dedicated to preserving and protecting business, investment, and other commercial rights and interests.

Morgan & Morgan also has a dedicated National Consumer Class Action and Mass Tort Department staffed with lawyers committed to representing large numbers of individuals in MDL proceedings and class action cases throughout the country. After the April 20, 2010, Deepwater Horizon explosion and oil spill, the firm established an interdisciplinary Oil Spill Practice Group to assist businesses, individuals and governmental agencies that suffered financial losses as a result of oil spill. The interdisciplinary Oil Spill Practice Group is led by the Consumer Class Action & Mass Tort Department together with the firm's Business Trial Group, Maritime Litigation Group and the Mississippi litigation practice. Morgan and Morgan has many clients throughout the gulf region who were impacted by the oil spill and the firm was among the first to file claims arising from the oil spill in south and coastal Florida.

The principal members of Morgan & Morgan's National Consumer Class Action and Mass Tort Department are:

Scott Wm Weinstein Mr. Weinstein practices in Morgan & Morgan's Fort Myers, Florida office. Mr. Weinstein serves as the Managing Partner of the firm's National Consumer Class Action and Mass Tort Department, handling mass tort litigation, consumer class action litigation and complex commercial litigation nationwide. Mr. Weinstein has broad experience and is nationally known in the areas of consumer protection, pharmaceutical and medical device litigation, and cases involving food-borne illnesses. He has served in leadership positions in many consumer class actions in State and Federal Courts around the country as well as in Multi-District Litigation where he was appointed Co-Lead and Liaison Counsel in the case *In re: Denture Cream Products Liability Litigation*, MDL No. 2051 (Southern District of Florida) and

to Plaintiffs' Steering Committees in several cases including *In re: Heparin Products Liability Litigation*, MDL No. 1953 (Northern District of Ohio); *In re: Digitek Products Liability Litigation*, MDL No 1968 (Southern District of West Virginia); *In re: Total Body Formula Products Liability Litigation*, MDL No. 1985 (Northern District of Alabama); *In re: Bayer Corp. Combination Aspirin Products Marketing and Sales Practices Litigation*, MDL No. 2023 (Eastern District of New York); and *In re: Chinese-Manufactured Drywall Products Liability Litigation*, MDL No. 2047 (Eastern District of Louisiana).

Mr. Weinstein was educated at the University of Florida, earning a B.S. degree in 1982 and a Juris Doctorate degree in 1985. He was inducted into Florida Blue Key while at the University of Florida. He currently serves as a member of the Florida Bar Board of Governors. He is Past President of the Lee County (Florida) Bar Association, Past Chair of The Florida Bar Grievance Committee "A" Twentieth Judicial Circuit, a member of the Twentieth Judicial Circuit Peer Review Committee, and Past President of the Naples/Fort Myers Chapter, American Board of Trial Advocates ("ABOTA"). He is "AV" rated by Martindale-Hubbell and in 2009 was selected as a member of the "Florida Legal Elite."

Alphonso Michael "Mike" Espy A partner practicing in Morgan and Morgan's Mississippi office, Mr. Espy is a member of the Mississippi State Bar Association and all Federal Courts in Mississippi; he served as Regional Managing Attorney for Central Mississippi Legal Services, handling all sorts of civil litigation matters for income-eligible clients in a five county area; he was Assistant Secretary of State in charge of Mississippi's public lands, which included all public properties above the mean high tide mark. Notably, Mr. Espy was the first African American Assistant Secretary of State in Mississippi history. Mr. Espy served the State of Mississippi as Assistant Attorney General, Director of the Office of Consumer Protection where he managed and litigated cases arising from consumer fraud. He drafted the fraud prevention legislation which was adopted into the Mississippi Code. Mr. Espy was the first African American to serve as an Assistant Attorney General in Mississippi history.

In 1986, Mr. Espy became the first African American Member of Congress from Mississippi since Reconstruction, serving the state's Second Congressional "Delta" District. In this capacity, Mr. Espy served on the House of Representative's Budget and Agriculture Committees; as Chairman of the Subcommittee on Cotton, Rice and Sugar; Chairman of the Domestic Hunger Committee, and a member of the Select Committee on Hunger; he authored a Bill signed into law by President Reagan creating the Economic Development District including Louisiana, Mississippi, Arkansas, Tennessee, Missouri, and Illinois.

In 1996, Mr. Espy became the nation's 25th Secretary of Agriculture, serving the Clinton Administration and responsible for managing 124,000 employees and a \$63 Billion budget. He personally negotiated GATT and NAFTA treaties, reorganized the Department of Agriculture, reformed the meat and poultry inspection systems and emphasized conservation, forestry and wetlands restoration.

In September, 2010, Mr. Espy was one of fifteen attorneys chosen to serve on the Plaintiffs' Steering Committee of Gulf Oil Spill MDL, *In Re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf Of Mexico, April 20, 2010*, MDL No. 2179 (Eastern District of Louisiana). Mr. Espy also serves in a leadership position on numerous sub-committees of the Plaintiffs' Steering Committee of Gulf Oil Spill MDL.

Frank M. Petosa Mr. Petosa is located in Morgan and Morgan's Davie office. He leads the firm's South Florida personal injury practice and is also integrally involved with the firm's National Consumer Class Action and Mass Tort Department. Mr. Petosa coordinates the firm's interdisciplinary Oil Spill Practice Group. Mr. Petosa also partners with Mike Espy in his role as a member of the Plaintiffs' Steering Committee of the Gulf Oil Spill MDL and he holds leadership positions on numerous sub-committees of the Plaintiffs' Steering Committee of Gulf Oil Spill MDL.

Mr. Petosa is a Past President of the Florida Justice Association and a Past Chair and Trustee of the Florida Justice Political Action Committee. In addition, he previously served as Chair of the Nursing Home and Auto Insurance Committees and Fundraising Chair for the Florida Justice Association. He also served as a member of the Florida Justice Association's Medical Liability and Arbitration Committees. Mr. Petosa has frequently lectured at Florida Justice Association and American Association for Justice seminars throughout the country on a variety of topics relating to medical malpractice, nursing home and personal injury litigation. He has also testified extensively before Florida Senate and House committees on a wide range of issues impacting the civil justice system and in opposition to tort reform. Mr. Petosa is also a Fellow of the American Bar Foundation, a member of the Southern Trial Lawyers Association and a member of the National Citizens Coalition for Nursing Home Reform. In 2009 and 2010, Mr. Petosa was named a Florida Super Lawyer.

Mr. Petosa was admitted to the Florida Bar in 1993. He graduated from the University of Florida with a B.A. degree in 1989 and a Juris Doctorate degree with honors in 1992.

Michael Goetz Mr. Goetz practices in Morgan & Morgan's Tampa, Florida office. After graduating with honors from the University of Florida's College of Law in 1992, Mr. Goetz joined the international law firm of Holland & Knight LLP where his practice focused on the defense of claims involving product liability, medical negligence, and general liability, as well as complex commercial litigation matters. He became a Partner in the firm on January 1, 2000. In 2002, Mr. Goetz joined Morgan & Morgan, P.A., where his practice shifted to the prosecution of personal injury and wrongful death claims on behalf of individuals and consumer classes. He has represented hundreds of clients of the firm in cases involving automobile and premises liability, nursing home neglect and abuse, and environmental torts. Moreover, Mr. Goetz handles mass tort actions for the firm nationwide, including product liability claims involving recalled pharmaceuticals and medical devices. He was appointed to the Plaintiffs' Steering Committee in the case of *In Re: Total Body Formula Products Liability Litigation*, MDL No. 2051 (Northern District of Alabama) and he currently holds PSC subcommittee positions in a number of ongoing MDL's.

Mr. Goetz is "AV" rated by Martindale-Hubbell. In 2004, 2005, 2006, 2007, and 2008, he was designated by *Florida Trend's Magazine* as a "Florida Legal Elite" in the field of Civil Trial, and in 2007, 2008, 2009, and 2010, he was designated by *Law & Politics Magazine* as a Florida "Super Lawyer" in the field of personal injury.

Mr. Goetz was admitted to The Florida Bar in 1992. He is currently an active member in the American Association for Justice, The American Trial Lawyers Association, and the

Hillsborough County Bar Association. Mr. Goetz earned his B.A. degree, *magna cum laude*, from Emory University in 1989, and was inducted into the Phi Beta Kappa Honor Society.

J. Andrew Meyer Mr. Meyer is located in Morgan & Morgan's office in Tampa, Florida. Mr. Meyer focuses his practice on consumer class action litigation. Prior to his joining Morgan & Morgan in 2009, Mr. Meyer was a partner at James, Hoyer, Newcomer & Smiljanich, a firm specializing in nationwide consumer class action cases. Prior to his association with the James Hoyer firm, Mr. Meyer was a partner with the law firm of Carlton Fields. Mr. Meyer also served as a law clerk to the Honorable Chris W. Altenbernd of the Florida Second District Court of Appeal.

Mr. Meyer served as Editor of the Corporate Counsel Newsletter, American Bar Association Section of Litigation, Corporate Counsel Committee from 2002 to 2004. He is Past Chair of the Florida Bar Unlicensed Practice of Law Committee "A" Sixth Judicial Circuit. Mr. Meyer has published several legal articles including co-authoring "Petitions for Extraordinary Relief," Chapter 17, A Defense Lawyer's Guide to Appellate Practice (DRI) (2004); "Extraordinary Writs," Florida Civil Practice Before Trial, Chapter 25, published by the Florida Bar (7th Ed. 2004); and "When It's Your Last Chance: Tips on Obtaining Discretionary Review," Vol. 27 No. 4, Litigation, 11 (Summer 2001).

Mr. Meyer was educated at the University of Florida, graduating in 1991 with a degree in Economics awarded with High Honors, and with a Juris Doctorate degree in 1995. While at the University of Florida, Mr. Meyer was inducted into Florida Blue Key and Phi Beta Kappa.

Mr. Meyer has been appointed by the court as counsel for plaintiffs in several nationwide consumer class action cases, including *DeHoyos v. Allstate Insurance Company*, Civil Action No. 5:01-1010 (Western District of Texas), *Healey v. Allianz Life Insurance Company*, Civil Action No. 2:05-8908 (Central District of California), and *Hill v. Countrywide*, Case No. A-0178441 (Texas 58th District Court, Jefferson County). Most recently, he has been appointed to the Plaintiffs' Steering Committee in the case of *In Re: Apple iPhone 3G and 3GS "MMS" Marketing and Sales Practices Litigation*, MDL No. 2116 (Eastern District of Louisiana).

Pete Albanis Mr. Albanis is located in Morgan & Morgan's office in Ft. Myers, Florida. He has been a member of the firm's National Consumer Class Action and Mass Tort Department since March 2009. Mr. Albanis focuses his practice on Chinese Drywall and defective denture cream litigation in addition to representing individuals in copyright and trademark infringement disputes. Prior to joining Morgan & Morgan, Mr. Albanis worked for seven years for a large commercial litigation firm in Chicago where he specialized in intellectual property, securities, and real estate litigation. Mr. Albanis graduated from The University of Chicago in 1999 and DePaul University College of Law in 2002.

Tamra Givens Ms. Givens practices in the area of consumer class actions in Morgan and Morgan's Tampa office. Ms. Givens obtained her undergraduate degree in psychology from the University of Florida, with honors, in 2000, and earned her law degree from the University of Florida, cum laude, in 2003. During law school, Ms. Givens was a member of the Florida Law Review and published a case comment titled "Constitutional Law: Narrowing the Scope of the Fourth Amendment," 54 Fla. L. Rev. 567 (2002). Ms. Givens also completed an internship at the Florida Supreme Court where she served as an intern to Justice Harry Lee Anstead.

Prior to joining Morgan & Morgan, Ms. Givens was an associate at the law firm of James, Hoyer, Newcomer & Smiljanich, P.A., where she focused her practice on representing consumers in class action litigation. She is a former law clerk to the Honorable James D. Whittemore, United States District Judge, United States District Court for the Middle District of Florida.

Rachel L. Soffin Ms. Soffin practices in the area of consumer class actions in Morgan and Morgan's Tampa office. Ms. Soffin is originally from Detroit, Michigan. She moved to Florida in 1993 and later obtained her undergraduate degree in Finance, with honors, from The Florida State University. While in college, Ms. Soffin worked at the Florida Legislature for three sessions, where she worked closely with government leaders. Ms. Soffin's experience at the Florida Legislature further developed her interest in the law. Ms. Soffin earned her law degree from Stetson University College of Law, cum laude, where she served as a Digest Writer on the Stetson Law Review and was published multiple times in that capacity. In addition to being admitted to practice in the state courts of Florida and Georgia, Rachel is also admitted to practice in the United States District Court for the Middle District of Florida.

EXHIBIT B

Exhibit B

**IN RE DIGITEK® PRODUCTS LIABILITY LITIGATION
MDL NO. 1968**

Time Report
November 5, 2008 through Present

MDL TIME

Attorney	Hours	Rate	Lodestar
Scott Weinstein (P)	44.6	\$650.00	\$28,990.00
Michael Goetz (P)	14.5	\$550.00	\$7,975.00
J. Andrew Meyer (P)	136.0	\$550.00	\$74,800.00
Pete Albanis (A)	13.2	\$400.00	\$5,280.00
SUBTOTAL	208.3		\$117,045.00

CLASS TIME

Attorney	Hours	Rate	Lodestar
Scott Weinstein (P)	20.2	\$650.00	\$13,130.00
J. Andrew Meyer (P)	196.0	\$550.00	\$107,800.00
Tamra Givens (A)	84.0	\$450.00	\$37,800.00
Rachel Soffin (A)	43.1	\$350.00	\$15,085.00
SUBTOTAL	343.3		\$173,815.00

TOTAL TIME

Attorney	Hours	Rate	Lodestar
Scott Weinstein (P)	64.8	\$650.00	\$42,120.00
Michael Goetz (P)	14.5	\$550.00	\$7,975.00
J. Andrew Meyer (P)	332.0	\$550.00	\$182,600.00
Tamra Givens (A)	84.0	\$450.00	\$37,800.00
Pete Albanis (A)	13.2	\$400.00	\$5,280.00
Rachel Soffin (A)	43.1	\$350.00	\$15,085.00
TOTAL	551.6		\$290,860.00

P – Partner
A- Associate